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# BROADCASTING IN AMERICA

## The Performance of Network Affiliates in the Top 50 Markets

*July 1973—A case study prepared by FCC Commissioner Nicholas Johnson and his staff and seminar students*

### BEFORE THE

## FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D.C. 20554

In Re Renewals of
BROADCAST LICENSES FOR ARKANSAS, LOUISIANA
AND MISSISSIPPI, 1973

MAY 31, 1973.

THE COMMISSION BY COMMISSIONERS BURCH (CHAIRMAN), ROBERT E. LEE, H. REX LEE, REID, WILEY, AND HOOKS, WITH COMMISSIONER JOHNSON DISSENTING AND ISSUING A STATEMENT, APPROVED STAFF ACTION REVIEWING BROADCAST LICENSES FOR ARKANSAS, LOUISIANA AND MISSISSIPPI FOR 1973.

### DISSENTING OPINION OF COMMISSIONER NICHOLAS JOHNSON

For my entire term I have dissented to the automatic renewal of licensees guilty of substandard performances in programming and (more recently) employment. The 1973 Arkansas-Louisiana-Mississippi renewals represent the last group that will cross my desk during my official tenure as Federal Communications Commissioner. Therefore, I and my staff and seminar students have prepared a major report on broadcasting in America, incorporating many of the complaints and suggestions of my seven years, for this one final renewal dissent.

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## CREDITS

This report is very much the product of a multi-group effort. The groups involved included my own staff, a group of Georgetown University law students in a seminar I was teaching, FCC employees outside of my office, and guests appearing before the seminar.

After the markets and stations were selected, decisions had to be made as to which categories of data to include and exclude, and the analyses to which they should be subjected. The data had to be extracted from FCC files. Computer programs were written. Additional research, writing and editing produced the text. The text and charts were laid out and typed many times. Each of these tasks involved uncounted hours of labor.

The principal participants in my own office were Larry Gage and Elaine Weiss. It was they who did the lion's share of the administration of the group effort, following up on the thousands of details necessary to the project's timely completion, editing the seminar students' contribution, and adding their own substantial segments of text. Karen Possner, a doctoral candidate in Communications at the University of Iowa, made valuable contributions to the seminar sessions and this report. Chuck Shepherd helped out with some of the charts. Bonnie Herbert and Karen Margrave bore the considerable burdens of typing and preparing this substantial manuscript at a time when their normal tasks were especially heavy.

The Georgetown law students were: Phil Argento, Thomas J. Collin, Raymond C. Fay, Ronald G. Gabler, Larry Harbin, Karen B. Possner, Lucilla A. Streeter, James R. Tanfield, David Wagner, James B. Wilcox, Jr. and Brady Williamson. They participated in my seminar with the advance knowledge that the burdens would be substantial and executed the assignment with great ability and good spirits. Derrick A. Humphries participated in the first two months of the seminar. The contribution of Larry Harbin in preparing and executing our computer programs warrants special mention.

Those FCC employees outside of my office who gave us invaluable assistance include: Pearl Cook, Larry Eads, John Foret, Alex Korn, Quentin Proctor, Allan Stillwell, Wally Johnson, David Westin and Harold Kassens. We very much appreciate their cooperation—occasionally requiring their staying well beyond the FCC's normal 4:30 p.m. closing time.

Seminar guests who gave us an evening of their time included: Sam Buffone, a former seminar student and currently an associate in Stern Concern; former FCC Commissioner Kenneth A. Cox; former FCC General Counsel Henry Geller, currently with the Rand Corporation; Dr. Everett Parker, Director of the United Church of Christ Office of Communications; Tracy Westen, a former legal assistant of mine and currently Director of Stern Concern; and Dr. Clay T. Whitehead, Director of the White House Office of Telecommunications Policy—as well as most of the FCC employees mentioned above. Each contributed in his or her own way to the seminar participants' understanding of the performance and regulation of broadcasting in America.

The other friends and advisors who have had some input during the past seven years to my thinking about broadcast regulation in general and this approach to it in particular are too numerous to itemize but are no less important to the end product.

With thousands of pieces of data copied and handled many times, there are undoubtedly errors somewhere in this report. All I can say is that we have done our best to keep such errors to an absolute minimum and express our regrets in advance to any broadcaster who has been adversely affected by such error.

NICHOLAS JOHNSON,
*Washington, D.C.*

June 1973

## INTRODUCTION

The revelations surrounding Watergate have only dramatized what many concerned citizens and public interest lawyers have known for a long time: we cannot rely on government to solve our problems. The regulatory agencies set up to serve the public interest all too often end up almost totally subservient to industry pressure.

Whatever may be the case elsewhere, however, the Federal Communications Commission is a classic case of what now Chief Justice Burger once called "a curious neutrality in favor of the licensee." [1]

Seemingly congenital pro-industry bias, of course, is no reason to give up on the agency. Quite the contrary. It must be watched all the more closely. There must be appeals to the courts and Congressional and press exposes of the FCC's most egregious decisions. There must be public participation in license renewal hearings, fairness doctrine complaints, FCC rule makings, Congressional hearings involving the agency, and so forth. Still, it is only the better part of wisdom and imagination to try to come up with alternatives to government at the same time efforts are being made to maximize the potential of the FCC.

One such alternative is represented by this report. It is, quite simply, an effort to use public disclosure of broadcasters' performance, and comparative rankings of those broadcasters, as a means of rewarding the better stations and punishing the worst.

It is true, of course, that this analysis of what is, after all, FCC data, may attract the attention of FCC staff or Commissioners, or may provide an incentive to outraged citizens to file license renewal challenges against the worst stations. This report may be more seriously considered by broadcasters because they are aware of that potential threat. But that is not the principal purpose of the report. The major hope is simply that the mere publishing of this data will, standing alone, provide reinforcement for the better stations and an incentive to improvement by the worst.

It is true that an FCC Commissioner was involved in the preparation of this document. But in many ways that should be irrelevant to its impact. The data used is publicly available from the FCC's files. And broadcasters have little to fear from the vote of one dissenting Commissioner on a seven-person Commission. In short, this is the kind of study that any group should be able to do—nationally, as this one, or locally, and in more depth.

This report represents the attempt of one Commissioner, his staff, and seminar students to analyze the performance of each of the network affiliates in the top fifty television markets in the country. Because the findings are presented in the form of *rankings* of those stations, in areas of performance from employment to programming, it is perhaps fitting to begin the report with the overall composite ranking of the affiliates with regard to their programming performance.

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[1] *Office of Communication of the United Church of Christ v. Federal Communications Commission*, 359 F 2d 994 (D.C. Cir. 1966).

Quite simply, this table ranks each of the stations in the study based on a composite of *all* of the programming criteria analyzed in Chapter one. In this table KPIX-TV, San Francisco, ranks as the best-programmed station in the top fifty markets, and WCCB, Charlotte, N.C., ranks as the worst.

TABLE 1.—*Network affiliates ranked by composite of all programming criteria*

| Rank | Call letters | Net. aff. | Mkt. No, | Location |
|---|---|---|---|---|
| 1 | KPIX | CBS | 8 | San Francisco |
| 2 | WJZ | ABC | 19 | Baltimore |
| 3 | KING | NBC | 16 | Seattle-Tacoma |
| 4 | KDKA | CBS | 9 | Pittsburgh |
| 5 | KYW | NBC | 4 | Philadelphia |
| 6 | WPLG | ABC | 18 | Miami |
| 7 | WMAL | ABC | 10 | Washington D.C. |
| 8 | WTAE | ABC | 9 | Pittsburgh |
| 9 | WFMY | CBS | 48 | Gnsb-High Pt-Win Sal |
| 10 | KGW | NBC | 26 | Portland |
| 11 | WWL | CBS | 31 | New Orleans |
| 12 | WRC | NBC | 10 | Washington D.C. |
| 13 | WABC | ABC | 1 | New York City |
| 14 | KNBC | NBC | 2 | Los Angeles |
| 15 | WIIC | NBC | 9 | Pittsburgh |
| 16 | WTIC | CBS | 22 | Hartford-New Haven |
| 17 | WNAC | ABC | 6 | Boston |
| 18 | KATU | ABC | 26 | Portland |
| 19 | WHAS | CBS | 36 | Louisville |
| 20 | KCRA | NBC | 27 | Sacramento-Stockton |
| 21 | KOIN | CBS | 26 | Portland |
| 22 | WBNS | CBS | 28 | Columbus |
| 23 | KTAR | NBC | 45 | Phoenix |
| 24 | KOMO | ABC | 16 | Seattle-Tacoma |
| 25 | WLWT | NBC | 20 | Cincinnati |
| 26 | WCBS | CBS | 1 | New York City |
| 27 | KMOX | CBS | 12 | St Louis |
| 28 | WSM | NBC | 30 | Nashville |
| 29 | WKY | NBC | 41 | Oklahoma City |
| 30 | WAST | ABC | 37 | Albany-Schenectady-T |
| 31 | WSB | NBC | 17 | Atlanta |
| 31 | WBZ | NBC | 6 | Boston |
| 33 | KSL | CBS | 50 | Salt Lake City |
| 34 | WMAR | CBS | 19 | Baltimore |
| 35 | WZZM | ABC | 41 | Kalamazoo-Gr Rapids |
| 36 | WDSU | NBC | 31 | New Orleans |
| 37 | WRTV | NBC | 14 | Indianapolis |
| 38 | WBFN | CBS | 25 | Buffalo |
| 39 | WNBC | NBC | 1 | New York City |
| 40 | KNXT | CBS | 2 | Los Angeles |
| 41 | KPRC | NBC | 15 | Houston |
| 42 | WCPO | CBS | 20 | Cincinnati |
| 43 | WMAQ | NBC | 3 | Chicago |
| 44 | KOVR | ABC | 27 | Sacramento-Stockton |
| 45 | WITI | ABC | 21 | Milwaukee |
| 46 | WCAU | CBS | 4 | Philadelphia |
| 47 | WSYR | NBC | 43 | Syracuse |
| 48 | WBAL | NBC | 19 | Baltimore |
| 49 | WBRC | ABC | 38 | Birmingham |
| 50 | WPVI | ABC | 4 | Philadelphia |
| 51 | WPRI | CBS | 34 | Providence |
| 52 | WAPI | NBC | 38 | Birmingham |
| 53 | KUTV | NBC | 50 | Salt Lake City |
| 54 | KWTV | CBS | 41 | Oklahoma City |
| 55 | WTOP | CBS | 10 | Washington D.C. |
| 56 | WCKT | NBC | 18 | Miami |
| 57 | WSOC | NBC | 35 | Charlotte |
| 58 | WOAI | NBC | 45 | San Antonio |
| 59 | KSTP | NBC | 13 | Minneapolis-St Paul |
| 60 | WAGA | CBS | 17 | Atlanta |
| 61 | WSIX | ABC | 30 | Nashville |
| 62 | WOTV | NBC | 41 | Kalamazoo-Gr Rapids |
| 63 | WXII | NBC | 48 | Gnsb-High Pt-Win Sal |
| 64 | KTRK | ABC | 15 | Houston |
| 65 | WLWI | ABC | 14 | Indianapolis |
| 66 | KSD | NBC | 12 | St Louis |

TABLE 1.—*Network' affiliates ranked by composite of all programming criteria*

| Rank | Call letters | Net. aff. | Mkt. No. | Location |
|---|---|---|---|---|
| 66 | WTVJ | CBS | 18 | Miami |
| 68 | KTVI | ABC | 12 | St Louis |
| 69 | WWJ | NBC | 5 | Detroit |
| 70 | KHOU | CBS | 15 | Houston |
| 71 | WLCY | ABC | 24 | Tampa-St Petersburg |
| 72 | WFBC | NBC | 40 | Gnville-Sptnbg-Ashvi |
| 73 | WKBW | ABC | 25 | Buffalo |
| 74 | WTMJ | NBC | 21 | Milwaukee |
| 75 | WBBM | CBS | 3 | Chicago |
| 76 | KGO | ABC | 8 | San Francisco |
| 77 | WJW | CBS | 7 | Cleveland |
| 78 | KSAT | ABC | 45 | San Antonio |
| 79 | WVUE | ABC | 31 | New Orleans |
| 80 | WTVT | CBS | 24 | Tampa-St Petersburg |
| 81 | WAVY | NBC | 44 | Norf-Newp News-Hamp |
| 82 | WBTV | CBS | 35 | Charlotte |
| 83 | WLWD | NBC | 39 | Dayton |
| 84 | WCCO | CBS | 13 | Minneapolis-St Paul |
| 85 | WFAA | ABC | 11 | Dallas-Fort Worth |
| 86 | WLAC | CBS | 30 | Nashville |
| 87 | KCMO | CBS | 23 | Kansas City |
| 88 | WTEV | ABC | 34 | Providence |
| 89 | WMC | NBC | 29 | Memphis |
| 90 | WTEN | CBS | 37 | Albany-Schenectady-T |
| 91 | KOCO | ABC | 41 | Oklahoma City |
| 92 | WLKY* | ABC | 36 | Louisville |
| 93 | WBAP | NBC | 11 | Dallas-Fort Worth |
| 94 | WJAR | NBC | 34 | Providence |
| 95 | WTNH | ABC | 22 | Hartford-New Haven |
| 96 | KFMB | CBS | 49 | San Diego |
| 97 | KTVK | ABC | 45 | Phoenix |
| 98 | WTOL | CBS | 45 | Toledo |
| 99 | KMGH | CBS | 32 | Denver |
| 100 | WDHO* | ABC | 45 | Toledo |
| 101 | KDFW | CBS | 11 | Dallas-Fort Worth |
| 102 | KABC | ABC | 2 | Los Angeles |
| 103 | WHNB* | NBC | 22 | Hartford-New Haven |
| 104 | WISH | CBS | 14 | Indianapolis |
| 105 | KXTV | CBS | 27 | Sacramento-Stockton |
| 106 | WAVE | NBC | 36 | Louisville |
| 107 | WNYS | ABC | 43 | Syracuse |
| 108 | WHEN | CBS | 43 | Syracuse |
| 109 | KCPX | ABC | 50 | Salt Lake City |
| 110 | WHTN | ABC | 33 | Charleston-Huntingto |
| 111 | WLOS | ABC | 40 | Gnville-Sptnbg-Ashvi |
| 112 | KGTV | NBC | 49 | San Diego |
| 113 | KOA | NBC | 32 | Denver |
| 114 | KIRO | CBS | 16 | Seattle-Tacoma |
| 115 | WLS | ABC | 3 | Chicago |
| 116 | WKYC | NBC | 7 | Cleveland |
| 117 | WXYZ | ABC | 5 | Detroit |
| 118 | WRGB | NBC | 37 | Albany-Schenectady-T |
| 119 | WSPD | NBC | 45 | Toledo |
| 120 | WKRC | ABC | 20 | Cincinnati |
| 121 | WCHS | CBS | 33 | Charleston-Huntingto |
| 122 | KNSP | ABC | 13 | Minneapolis-St Paul |
| 123 | WGR | NBC | 25 | Buffalo |
| 124 | WSAZ | NBC | 33 | Charleston-Huntingto |
| 125 | WEWS | ABC | 7 | Cleveland |
| 126 | WHIO | CBS | 39 | Dayton |
| 127 | WFLA | NBC | 24 | Tampa-St Petersburg |
| 128 | WREC | CBS | 29 | Memphis |
| 129 | WSPA | CBS | 40 | Gnville-Sptnbg-Ashvi |
| 130 | KENS | CBS | 45 | San Antonio |
| 131 | WLWC | NBC | 28 | Columbus |
| 132 | WISN | CBS | 21 | Milwaukee |
| 133 | WJBK | CBS | 5 | Detroit |
| 134 | WDAF | NBC | 23 | Kansas City |
| 135 | KMBC | ABC | 23 | Kansas City |
| 136 | WTVN | ABC | 28 | Columbus |
| 137 | WVEC | ABC | 44 | Norf-Newp News-Hamp |
| 138 | WKZO* | CBS | 41 | Kalamazoo-Gr Rapids |
| 139 | WBMG* | CBS | 38 | Birmingham |
| 140 | KOOL | CBS | 45 | Phoenix |
| 141 | WHBQ | ABC | 29 | Memphis |
| 142 | KBTV | ABC | 32 | Denver |
| 143 | WQXI | ABC | 17 | Atlanta |
| 144 | WCCB* | ABC | 35 | Charlotte |

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*Denotes UHF network affiliate.

This report represents an effort to do more than just charge the Commission once again with the refusal to develop any positive standards for the performance of its broadcast licensees. Such charges have often been made, in any different forums. This is an effort to demonstrate the type of analysis that *could* be made of the available indicia of a licensee's performance prior to the renewal of its right to profit from the public airwaves.

The Commission has often been confronted with the opportunity to develop minimum standards in areas of programming, ownership and employment. Each time those standards have either been rejected or thoroughly emasculated by the Commission majority.[2] When former Commissioner Kenneth A. Cox was Chief of the Broadcast Bureau, he sent letters to stations with percentages of news and public affairs programming below certain minimum levels—a practice swiftly ended by the full Commission.

The major problem seems to arise from the broadcasters' (and most Commissioners') refusal to accept the fact that there is most emphatically a difference between censorship of programming, which the Communications Act of 1934 specifically prohibits,[3] and assurance of adequate levels of service in areas important to the listening or viewing public regardless of the subject matter or content of the programming presented.[4]

When Kenneth Cox was an FCC Commissioner he attempted to come up with some method at license renewal time for determining whether or not a licensee had adequately served the public interest—or whether it deserved further inquiry because of poor performance. One simple standard used the data available on the license renewal form. It merely required the licensee to demonstrate that 5% of its program week had been devoted to news, 1% to public affairs, and 5% to "other" non-entertainment programming (which came to be known as the "5-1-5" standard)—far too low, especially for television licensees.

Other approaches were also tried. The occasion of the Oklahoma renewals (all the licenses in any given state expire at the same time) was used to do a book-length study of broadcasting in the state of Oklahoma, describing the communities in detail, noting the various sources of information available, from print as well as broadcast media, and generally describing the performance of the licensees seeking renewal at that time.[5]

Later, in the state of New York,[6] and for the renewals processed jointly from Washington, D.C., Maryland and Virginia,[7] still another approach was used. Stations were ranked by all the criteria available from their license renewal form—news and public affairs, the number of public service announcements, and so forth—in a manner that is similar in some ways to the procedure of this larger study of network affiliates.

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[2] The most celebrated, of course, was the 1946 "Blue Book," Part II, which attempted for the first time to set minimum standards for service to the public: it did not last the decade. It is reprinted in F. Kahn, ed., *Documents of American Broadcasting* 141–146 (rev'd. ed. 1972). Most recently, former Commission General Counsel Henry Geller proposed a minimum level of performance below which a broadcaster would be questioned at renewal time; his proposal—that broadcasters program at least 15% local, 10% news and 5% public affairs, both overall and in prime time—was never seriously considered by the Commission majority.

[3] 47 U.S.C. § 326.

[4] For an excellent explication of the broadcaster's point of view, see Kalven, "Broadcasting, Public Policy and the First Amendment," 10 J. Law & Econ. 15 (1967).

[5] *Renewal of Standard Broadcast and Television Licenses, an Oklahoma Case Study,* 14 F.C.C. 2d 1 (1968).

[6] *Renewal of Standard Broadcast and Television Licenses,* 18 F.C.C. 2d 268, 269, 322 (1969).

[7] *Renewals of Standard Broadcast and Television Licenses,* 21 F.C.C. 2d 35 (1969).

The impact of each of these efforts upon the Commission was minimal, although it has recently adopted a badly-needed new renewal application which somewhat improves the quality of the data collected from licensees.[8] It has not, however, acted favorably on any proposals for minimum standards on that information.[9]

The impact upon the industry, however, has been somewhat more significant, and has been a motivating factor in this study. For example, even though broadcasters and their lawyers know that a failure to meet the 5–1–5 standard will have no effect whatsoever upon license renewals, they are increasingly programming to meet those standards if only because they dislike even the minimal adverse attention of a dissenting opinion buried deep within the official FCC Reports. When the New York and Washington studies were published, broadcasters were quite pleased to attract public and advertiser attention to their high ratings—and very quick to call Commissioners' attention to any miscalculation that resulted in even a slightly lower rating than they felt they deserved.

In attempting to mount a project that would have an effect on as wide a segment of American broadcasting as possible, there has been great selectivity in both the stations chosen and the criteria used. It would have been impossible to evaluate each and every one of the more than 8,000 radio and television stations in this country. First, television was chosen over radio, because its influence is more widely felt and also, quite frankly, because it was an easy way to eliminate the vast majority of licensees at the outset. The 50 largest television markets in the country were selected from among the some 12,000 communities in the United States, because they contain more than 65% of the American population and constitute the most "cost effective" focus.[10] The "top 50" have often been selected by the FCC as a natural break in its broadcasting regulations. Finally, the three network affiliates in each market were selected (rather than including independent television stations as well) because those are the choice of roughly 85%

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[8] *In the Matter of Formulation of Rules and Policies Relating to the Renewal of Broadcast Licensees,* Docket No. 19153. FCC 73–451 (May 4, 1973).

[9] For example, *see* the Henry Geller proposal discussed in note 2 *supra*.

[10] The "top 50 markets" used in this study were determined on the basis of the most recent rankings by the American Research Bureau, published in ARB's 1972 *Television Market Analysis* on November 20, 1972. No more current data will be published until after September 1, 1973. The market's rank is determined according to the average number of households reached from 9 a.m. to midnight within a survey area. Survey areas are the geographic areas comprised of those counties in which ARB estimates 98% of the net weekly circulation of home market stations occurs. Because the average number of households is reported by thousands, two markets are tied for the 41st rank and three are tied for the 45th. Accordingly, we list no 42nd, 46th or 47th rank.

The only exception to ARB's top 50 markets was our deletion of Wilkes Barre-Scranton, which would have been number 49, from our study and the concomitant elevation of Salt Lake City, otherwise market number 51. This was done because we felt it unfair to compare the results in Wilkes Barre-Scranton, an all-UHF market, with those of its VHF competitors, even though we retained five markets in which one network affiliate broadcasts on UHF (they are appropriately identified in the rankings).

The top 50 markets include parts of some 43 different states and help send over 82% of the members of the House of Representatives to Congress.

of the nation's viewers at any given moment.[11] Moreover, as they tend to have the largest revenue of any stations in the industry, one can fairly hold them to the highest standards. Theoretically, then, that produces a population of some 150 stations (three network affiliates in each of 50 markets). However, factors intervened to reduce the final sample to 144, although for some purposes (such as employment there was information available on 147.[12]

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[11] That is not to say there aren't a few enormously successful independents that should have been included in a study of America's biggest broadcasters. However, we felt we had to draw the line somewhere, and we could not have justified the inclusion of independents in less than all the top 50 markets.

[12] Three network affiliates located in the top 50 markets were eliminated from our study. Three additional stations were excluded from the over-all ranking and public service announcement portions of our report, but were included in the employment and ownership portions. The details are listed below:

| | |
|---|---|
| Call sign | KSCT |
| Channel | 39 |
| Affiliation | ABC |
| City | San Diego |
| Market number | 49 |
| Excluded from | Entire Study |

KSCT became San Diego's ABC affiliate early this year. Prior to this, XETV, a Mexican station, was the ABC affiliate. The Commission has no jurisdiction over, and therefore no data pertaining to, broadcasters outside the U.S.

| | |
|---|---|
| Call sign | KRON |
| Channel | 4 |
| Affiliation | NBC |
| City | San Francisco |
| Market Number | 8 |
| Excluded from | Entire Study |

KRON's 1968 renewal was designated for hearing on 3/19/69; a final decision was not made until 5/3/73. During this period, the station was "in docket" and not required to submit renewal application information. Thus, we had no more recent data than that reflecting the station's performance between 1965 and 1968.

| | |
|---|---|
| Call sign | WCVB |
| Channel | 5 |
| Affiliation | ABC |
| City | Boston |
| Market number | 6 |
| Excluded from | Entire Study |

WCVB is just barely into its second year of operation after a Commission and court battle that lasted nearly a decade; its licensee was a successful competing applicant for the frequency formerly licensed to WHDH, Inc.

| | |
|---|---|
| Call sign | WGHP |
| Channel | 8 |
| Affiliation | ABC |
| City | Greensboro |
| Market number | 48 |
| Excluded from | Composite ranking and public service announcements only |

WGHP was renewed in 1966, but its 1969 renewal application was designated for hearing on 6/1/70. As yet unresolved, the most recent renewal application data reflects the station's performance between 1963 and 1966.

| | |
|---|---|
| Call sign | WKEF |
| Channel | 22 |
| Affiliation | ABC |
| City | Dayton |
| Market number | 39 |
| Excluded from | Composite ranking and public service announcements only |

WKEF is a new UHF station which only commenced operation in 1969.

| | |
|---|---|
| Call sign | WTAR |
| Channel | 3 |
| Affiliation | CBS |
| City | Norfolk |
| Market number | 44 |
| Excluded from | Composite ranking and public service announcements only |

WTAR was renewed in 1966, but its 1969 renewal application was designated for hearing on 1/21/70. As yet unresolved, the most recent renewal application data reflects the station's performance between 1963 and 1966.

As an additional footnote, we wish to underscore the competitive problems faced by the five UHF affiliates that have been included in our study (WLKY, Louisville, 91st in our composite programming ranking: WDHO, Toledo, 100th: WHNB, Hartford, 103rd: WBMG, Birmingham, 139th; and WCCB, Charlotte, 144th). UHF stations are traditionally at a severe disadvantage in competing for viewers in a market, even when they are affiliated with a network. Virtually all UHF stations operate deeply in the red for years after they go on the air, and it can be expected that their performance will radically improve as they edge toward profitability. Finally, it must be noted that at least one of the UHF stations in this study, WDHO, Toledo, has been ranked on the basis of data submitted to the FCC before it had acquired even the financial stimulus of a network affiliation.

The analysis of the performance of those stations has been limited to information supplied by the broadcasters themselves on official U.S. Government forms in public files at the FCC.[13] No monitoring (viewing or listening) of any of the stations was undertaken. Nor was there even an examination of TV Guide or local newspaper listings for additional information. There was neither the time nor the manpower, and there was an affirmative desire to avoid any data gathering or subjective analyses that would subject the findings to "tis-tain't" arguments with broadcasters.

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[13] In order to provide the broadest possible view of television in the top 50 markets, it was occasionally necessary to use station data reported by former licensees. For example, if a station received its license renewal in June, 1972, and was sold in August, 1972, our data was taken from the information of the earlier licensee. This was the case with the seven stations listed below:

KBTV, Channel 9, ABC, Denver, Colorado.
Present licensee: Combined Communications Corp.
Former licensee: Mullins Broadcasting Co.
Date of change: September 19, 1972
KGTV, Channel 10, NBC, San Diego, California
Present licensee: McGraw-Hill Broadcasting Co.
Former licensee: Time-Life Broadcasting, Inc.
Date of change: June 1, 1972
Former call letters: KOGO
KMGH, Channel 7, CBS, Denver, Colorado
Present licensee: McGraw-Hill.
Former licensee: Time-Life.
Date of change: June 1, 1972
Former call letters: KLZ
KOCO, Channel 5, ABC, Oklahoma City
Present licensee: Combined Communications
Former licensee: Cimaron Television Corp.
Date of change: August 29, 1972
WCHS, Channel 8, CBS, Charleston-Huntington, W. Va.
Present licensee: Rollins Telecasting, Inc.
Former licensee: WCHS AM–TV Corp.
Date of change: April 30, 1973
WRTV, Channel 6, WBC, Indianapolis
Present licensee: McGraw-Hill
Former licensee: Time-Life
Date of change: June 1, 1972
Former call letters: WFMB
WTMJ, Channel 4, NBC, Milwaukee
Present licensee: WTMJ, Inc.
Former licensee: The Journal Co.

In addition, data other than form 303 programming data from the seven stations listed below was partially affected by similar changes in licensees:

Financial and Employment Data:
WXII, Channel 12, NBC, Greensboro/Winston Salem/High Point, N.C.
Present licensee: Multimedia, Inc.
Former licensee: Triangle Broadcasting Corp.
Date of change: October 2, 1972
WBTV, Channel 3, CBS, Charlotte, N. Carolina
Present licensee: Jefferson-Pilot Broadcasting Co.
Former licensee: Jefferson-Standard Broadcasting Co.
Date of change: November 7, 1972
WDSU, Channel 6, NBC, New Orleans
Present licensee: Cosmos Broadcasting of Louisiana
Former licensee: WDSU–TV, Inc.
Date of charge: November 29, 1972

Financial data only (taken partially from former and partially from present licensee):
WPVI, Channel 6, ABC, Philadelphia
Present: Capital Cities
Former: Triangle Publications
Date of change: April 27, 1971
WSAZ, Channel 3, NBC, Charleston-Huntington, W. Va.
Present licensee: Lee Enterprises, Inc.
Former licensee: Capital Cities
Date of change: April 27, 1971
WTEN, Channel 10, CBS, Albany-Schenectady-Troy, N.Y.
Present licensee: Albany TV, Inc.
Former licensee: Capital Cities
Date of change: April 27, 1971
WTNH, Channel 8, ABC, Hartford/New Haven
Present licensee: Capital Cities
Former licensee: Triangle Publications
Date of change: April 27, 1971

Finally, station WWYS–TV, Syracuse, New York, was granted a modification on December 12, 1972 that changed the name of the licensee from WRG Baker Television Corp. to WNYS–TV. The actual owners of the station remained substantially the same. And station WOTV, Grand Rapids-Kalamazoo was granted a change of call letters on July 1, 1972, from WOOD, although the licensee also remains the same.

The findings are grouped into three separate chapters dealing with programming performance, minority and female employment statistics, and ownership information. A fourth chapter is devoted to the use of this information by interested community groups or individuals. Appendices have been added that deal with the computer programming methodology, potential sources of information and assistance for those interested in pursuing the subject further, and additional information not included in the main body of the report.

The method of analyzing the stations' performance has been to select the most precise criteria available from the data collected and then simply rank the stations based on their performance. Thus, in programming, some four factors were isolated and explored. They were then combined for determination of a single overall ranking based on a composite computation of programming performance.

By this method, television station KPIX, San Francisco, owned by the Westinghouse Broadcasting Company, was the best-programmed station among network affiliates in the top 50 markets as of June, 1973; WCCB, Charlotte, N.C., was the worst. There is often a wide range of performance among affiliates within a city. But Pittsburgh and Portland would appear to be among the best, and Charleston-Huntington, W. Va., and Kansas City, Mo., among the worst. Baltimore seems to have the best performance overall in local programming, Washington in news, public affairs and other; Syracuse scores lowest in both categories. Oklahoma City stations have the most public service announcements; Nashville stations the fewest. Westinghouse Broadcasting Company's five television stations ranked 1, 2, 4, 5 and 31, thus making Westinghouse by far the best multiple owner in the country. The stations of Taft, ranked 49, 120, 123, 134 and 136, showed that corporate owner to be one of the worst.

In the employment chapter, stations with low or non-existent minority or female employment are singled out for special mention, and all the stations in the study are ranked on the basis of total employment as well as employment of minorities and women in high-paying positions. Stations WTEV, Providence, WNYS, Syracuse, and WCAU, Philadelphia were among the best, while KSL, Salt Lake City, KMSP, Minneapolis and WKZO, Kalamazoo-Grand Rapids were among the worst.

In the ownership chapter, the findings have been collated and rearranged to show the performance of individual owners, especially when (as is most often the case) they own two or more stations. In each section Commission policy is considered and its shortcomings pointed out, but the most important part of this report is the information regarding the relative performance of each network affiliate in the top 50 markets. See Appendix D for a summary of the ten best and ten worst stations in each area of programming and employment and Appendix E for a summary of what we consider to be the minimum tolerable levels of performance in each of those areas.

Finally, Chapter 4 is included on the assumption that anyone interested in improving the quality of broadcasting in this country can use this study as a handbook for the further pursuit of those improvements. This report is necessarily incomplete. Only the action of concerned people in their own local communities can ensure that it will have maximum impact on improving broadcasters' performance.

# Chapter 1

## Programming Performance

### I. INTRODUCTION

The composite programming ranking announced in the Introduction to this report consists of an evaluation of the programming of each of 144 network affiliates in the top 50 markets on the basis of four distinct programming criteria: a combination of news, public affairs and other programming; local programming; commercialization; and allocation of financial resources to program expenditures. Each of these areas will be explained in detail, and individual area rankings given, in the four sections of this chapter below. The composite programming ranking that precedes the substantive discussion in this chapter was determined by transposing the quantitative performance of each licensee in each of the four areas onto a scale of 0 to 100, then weighting them equally in determining the final average on which the overall ranking was based. For a more complete explanation of the analytical models used in this section, see Appendix A. The programming criteria are presented in Table 2 in the form of the station's rank in each of the four areas. For a composite ranking that presents the criteria based on the relative scale of 0 to 100, see Table 1–a in Appendix C.

*Network affiliates ranked by composite of all programming criteria*

| Rank | Call letters | Net. aff. | Mkt. No. | Location | Local | News, Pa and other | Commer. | Financial |
|---|---|---|---|---|---|---|---|---|
| 1 | KPIX | CBS | 8 | San Francisco | 31 | 13 | 1 | 103 |
| 2 | WJZ | ABC | 19 | Baltimore | 6 | 59 | 4 | 24 |
| 3 | KING | NBC | 16 | Seattle-Tacoma | 76 | 48 | 6 | 3 |
| 4 | KDKA | CBS | 9 | Pittsburgh | 4 | 6 | 30 | 57 |
| 5 | KYW | NBC | 4 | Philadelphia | 2 | 7 | 23 | 123 |
| 6 | WPLG | ABC | 18 | Miami | 10 | 1 | 81 | 52 |
| 7 | WMAL | ABC | 10 | Washington, D.C. | 28 | 40 | 41 | 9 |
| 8 | WTAE | ABC | 9 | Pittsburgh | 52 | 60 | 10 | 15 |
| 9 | WFMY | CBS | 48 | Gnsb-High Pt-Win Sal | 96 | 38 | 2 | 76 |
| 10 | KGW | NBC | 26 | Portland | 67 | 35 | 49 | 2 |
| 11 | WWL | CBS | 31 | New Orleans | 7 | 24 | 70 | 31 |
| 12 | WRC | NBC | 10 | Washington, D.C. | 49 | 15 | 101 | 7 |
| 13 | WABC | ABC | 1 | New York City | 63 | 77 | 49 | 1 |
| 14 | KNBC | NBC | 2 | Los Angeles | 3 | 3 | 138 | 35 |
| 15 | WIIC | NBC | 9 | Pittsburgh | 17 | 53 | 101 | 8 |
| 16 | WTIC | CBS | 22 | Hartford-New Haven | 68 | 28 | 5 | 110 |
| 17 | WNAC | ABC | 6 | Boston | 37 | 41 | 24 | 59 |
| 18 | KATO | ABC | 26 | Portland | 50 | 96 | 24 | 13 |
| 19 | WHAS | CBS | 36 | Louisville | 35 | 84 | 33 | 20 |
| 20 | KCRA | NBC | 27 | Sacramento-Stockton | 27 | 14 | 70 | 69 |
| 21 | KOIN | CBS | 26 | Portland | 84 | 29 | 57 | 12 |
| 22 | WBNS | CBS | 28 | Columbus | 22 | 19 | 81 | 61 |
| 23 | KTAR | NBC | 45 | Phoenix | 8 | 64 | 63 | 48 |
| 24 | KOMO | ABC | 16 | Seattle-Tacoma | 32 | 66 | 57 | 28 |
| 25 | WLWT | NBC | 20 | Cincinnati | 1 | 118 | 129 | 44 |
| 26 | WCBS | CBS | 1 | New York City | 75 | 4 | 108 | 27 |
| 27 | KMOX | CBS | 12 | St. Louis | 59 | 11 | 101 | 36 |
| 28 | WSM | NBC | 30 | Nashville | 24 | 97 | 63 | 16 |
| 29 | WKY | NBC | 41 | Oklahoma City | 16 | 78 | 36 | 70 |
| 30 | WAST | ABC | 37 | Albany-Schenectady-T | 135 | 119 | 8 | 4 |

*Network affiliates ranked by composite of all programming criteria*—Continued

| Rank | Call letters | Net. aff. | Mkt. No. | Location | Local | News, Pa and other | Commer. | Financial |
|---|---|---|---|---|---|---|---|---|
| 31 | WSB | NBC | 17 | Atlanta | 5 | 56 | 49 | 116 |
| 31 | WBZ | NBC | 6 | Boston | 15 | 16 | 49 | 138 |
| 33 | KSL | CBS | 50 | Salt Lake City | 57 | 90 | 88 | 6 |
| 34 | WMAR | CBS | 19 | Baltimore | 11 | 25 | 78 | 104 |
| 35 | WZZM | ABC | 41 | Kalamazoo-Gr Rapids | 112 | 45 | 41 | 14 |
| 36 | WDSU | NBC | 31 | New Orleans | 20 | 55 | 81 | 55 |
| 37 | WRTV | NBC | 14 | Indianapolis | 65 | 39 | 36 | 64 |
| 38 | WBEN | CBS | 25 | Buffalo | 55 | 21 | 57 | 80 |
| 39 | WNBC | NBC | 1 | New York City | 60 | 17 | 88 | 58 |
| 40 | KNXT | CBS | 2 | Los Angeles | 21 | 8 | 121 | 88 |
| 41 | KPRC | NBC | 15 | Houston | 29 | 22 | 78 | 94 |
| 42 | WCPO | CBS | 20 | Cincinnati | 40 | 49 | 98 | 33 |
| 43 | WMAQ | NBC | 3 | Chicago | 41 | 2 | 132 | 74 |
| 44 | KOVR | ABC | 27 | Sacramento-Stockton | 134 | 120 | 16 | 5 |
| 45 | WITI | ABC | 21 | Milwaukee | 72 | 111 | 16 | 41 |
| 46 | WCAU | CBS | 4 | Philadelphia | 42 | 9 | 121 | 73 |
| 47 | WSYR | NBC | 43 | Syracuse | 117 | 127 | 13 | 10 |
| 48 | WDAL | NBC | 19 | Baltimore | 19 | 33 | 88 | 101 |
| 49 | WBRC | ABC | 38 | Birmingham | 23 | 12 | 49 | 144 |
| 50 | WPVI | ABC | 4 | Philadelphia | 14 | 62 | 112 | 45 |
| 51 | WPRI | CBS | 34 | Providence | 115 | 94 | 3 | 113 |
| 52 | WAPI | NBC | 38 | Birmingham | 126 | 46 | 16 | 63 |
| 53 | KUTV | NBC | 50 | Salt Lake City | 83 | 104 | 63 | 11 |
| 54 | KWTV | CBS | 41 | Oklahoma City | 77 | 82 | 70 | 25 |
| 55 | WTOP | CBS | 10 | Washington D.C | 79 | 10 | 117 | 50 |
| 56 | WCKT | NBC | 18 | Miami | 71 | 27 | 41 | 117 |
| 57 | WSOC | NBC | 35 | Charlotte | 122 | 75 | 16 | 47 |
| 58 | WOAI | NBC | 45 | San Antonio | 58 | 88 | 30 | 93 |
| 59 | KSTP | NBC | 13 | Minneapolis-St Paul | 43 | 91 | 57 | 71 |
| 60 | WAGA | CBS | 17 | Atlanta | 70 | 5 | 121 | 79 |
| 61 | WSIX | ABC | 30 | Nashville | 82 | 125 | 30 | 22 |
| 62 | WOTV | NBC | 41 | Kalamazoo-Gr Rapids | 48 | 37 | 106 | 67 |
| 63 | WXII | NBC | 48 | Gnsb-High Pt-Win Sal | 118 | 105 | 28 | 21 |
| 64 | KIRK | ABC | 15 | Houston | 18 | 95 | 63 | 100 |
| 65 | WLWI | ABC | 14 | Indianapolis | 64 | 26 | 129 | 37 |
| 66 | KSD | NBC | 12 | St. Louis | 36 | 68 | 70 | 108 |
| 66 | WTVJ | CBS | 18 | Miami | 105 | 87 | 33 | 46 |
| 68 | KTVI | ABC | 12 | St. Louis | 86 | 140 | 24 | 19 |
| 69 | WWJ | NBC | 5 | Detroit | 9 | 31 | 129 | 112 |
| 70 | KHOU | CBS | 15 | Houston | 25 | 30 | 108 | 127 |
| 71 | WLCY | ABC | 24 | Tampa-St. Petersburg | 61 | 44 | 81 | 96 |
| 72 | WFBC | NBC | 40 | Gnville-Sptnbg-Ashvi | 104 | 63 | 13 | 130 |
| 73 | WKBW | ABC | 25 | Buffalo | 78 | 106 | 16 | 109 |
| 74 | WTMJ | NBC | 21 | Milwaukee | 13 | 92 | 106 | 89 |
| 74 | WBBM | CBS | 3 | Chicago | 33 | 18 | 141 | 65 |
| 76 | KGO | ABC | 8 | San Francisco | 94 | 70 | 98 | 30 |
| 77 | WJW | CBS | 7 | Cleveland | 69 | 43 | 101 | 77 |
| 78 | KSAT | ABC | 45 | San Antonio | 90 | 131 | 28 | 38 |
| 79 | WVUE | ABC | 31 | New Orleans | 107 | 112 | 41 | 34 |
| 80 | WTVT | CBS | 24 | Tampa-St. Petersburg | 80 | 32 | 117 | 51 |
| 81 | WAVY | NBC | 44 | Norf-Newp News-Hamp | 121 | 54 | 36 | 84 |
| 82 | WBTV | CBS | 35 | Charlotte | 46 | 52 | 88 | 120 |
| 83 | WLWD | NBC | 39 | Dayton | 30 | 42 | 137 | 83 |
| 84 | WCCO | CBS | 13 | Minneapolis-St. Paul | 12 | 74 | 139 | 72 |
| 85 | WFAA | ABC | 11 | Dallas-Fort Worth | 47 | 114 | 70 | 85 |
| 86 | WLAC | CBS | 30 | Nashville | 39 | 101 | 114 | 49 |
| 87 | KCMO | CBS | 23 | Kansas City | 54 | 69 | 101 | 97 |
| 88 | WTFV | ABC | 34 | Providence | 130 | 110 | 41 | 32 |
| 89 | WMC | NBC | 29 | Memphis | 38 | 80 | 114 | 92 |
| 90 | WTEN | CBS | 37 | Albany-Schenectady-T | 110 | 103 | 70 | 39 |
| 91 | KOCO | ABC | 41 | Oklahoma City | 62 | 124 | 81 | 53 |
| 92 | WLKY | ABC | 36 | Louisville | 136 | 142 | 11 | 23 |
| 93 | WBAP | NBC | 11 | Dallas-Fort Worth | 132 | 50 | 36 | 115 |
| 94 | WJAR | NBC | 34 | Providence | 114 | 47 | 70 | 91 |
| 95 | WTNH | ABC | 22 | Hartford-New Haven | 81 | 81 | 57 | 124 |
| 96 | KFMB | CBS | 49 | San Diego | 51 | 20 | 132 | 128 |
| 97 | KTVK | ABC | 45 | Phoenix | 88 | 122 | 49 | 75 |
| 98 | WTOL | CBS | 45 | Toledo | 87 | 71 | 63 | 122 |
| 99 | KMGH | CBS | 32 | Denver | 44 | 73 | 117 | 98 |
| 100 | WDHO | ABC | 45 | Toledo | 139 | 144 | 6 | 29 |
| 101 | KDFW | CBS | 11 | Dallas-Fort Worth | 26 | 34 | 121 | 141 |
| 102 | KABC | ABC | 2 | Los Angeles | 123 | 115 | 88 | 17 |
| 103 | WHNB | NBC | 22 | Hartford-New Haven | 116 | 23 | 63 | 136 |
| 104 | WISH | CBS | 14 | Indianapolis | 73 | 65 | 78 | 135 |
| 105 | KXTV | CBS | 27 | Sacramento-Stockton | 101 | 36 | 121 | 66 |
| 106 | WAVE | NBC | 36 | Louisville | 95 | 85 | 88 | 86 |
| 107 | WNYS | ABC | 43 | Syracuse | 144 | 143 | 8 | 18 |

*Network affiliates ranked by composite of all programming criteria*—Continued

| Rank | Call letters | Net. aff. | Mkt. No. | Location | Local | News, Pa and other | Commer. | Financial |
|---|---|---|---|---|---|---|---|---|
| 108 | WHEN | CBS | 43 | Syracuse | 127 | 89 | 88 | 54 |
| 109 | KCPX | ABC | 50 | Salt Lake City | 142 | 136 | 16 | 40 |
| 110 | WHTN | ABC | 33 | Charleston-Huntingto | 140 | 107 | 16 | 102 |
| 111 | WLOS | ABC | 40 | Gnville-Sptnbg-Ashvi | 143 | 137 | 12 | 60 |
| 112 | KGTV | NBC | 49 | San Diego | 111 | 102 | 88 | 62 |
| 113 | KOA | NBC | 32 | Denver | 56 | 79 | 108 | 132 |
| 114 | KIRO | CBS | 16 | Seattle-Tacoma | 66 | 83 | 108 | 125 |
| 115 | WLS | ABC | 3 | Chicago | 53 | 61 | 142 | 68 |
| 116 | WKYC | NBC | 7 | Cleveland | 113 | 86 | 121 | 43 |
| 117 | WXYZ | ABC | 5 | Detroit | 89 | 116 | 132 | 26 |
| 118 | WRGB | NBC | 37 | Albany-Schenectady-T | 100 | 121 | 36 | 129 |
| 119 | WSPD | NBC | 45 | Toledo | 124 | 113 | 41 | 107 |
| 120 | WKRC | ABC | 20 | Cincinnati | 74 | 138 | 33 | 133 |
| 121 | WCHS | CBS | 33 | Charleston-Huntingto | 85 | 132 | 24 | 140 |
| 122 | KMSP | ABC | 13 | Minneapolis-St. Paul | 109 | 141 | 13 | 126 |
| 123 | WGR | NBC | 25 | Buffalo | 141 | 109 | 41 | 81 |
| 124 | WSAZ | NBC | 33 | Charleston-Huntington | 119 | 58 | 70 | 139 |
| 125 | WEWS | ABC | 7 | Cleveland | 92 | 134 | 98 | 56 |
| 126 | WHIO | CBS | 39 | Dayton | 45 | 123 | 132 | 87 |
| 127 | WFLA | NBC | 24 | Tampa-St. Petersburg | 120 | 51 | 132 | 78 |
| 128 | WREC | CBS | 29 | Memphis | 131 | 108 | 57 | 114 |
| 129 | WSPA | CBS | 40 | Gnville-Sptnbg-Ashvi | 103 | 57 | 117 | 121 |
| 130 | KENS | CBS | 45 | San Antonio | 106 | 93 | 81 | 134 |
| 131 | WLWC | NBC | 28 | Columbus | 99 | 67 | 121 | 118 |
| 132 | WISN | CBS | 21 | Milwaukee | 97 | 98 | 121 | 82 |
| 133 | WJBK | CBS | 5 | Detroit | 93 | 99 | 114 | 106 |
| 134 | WDAF | NBC | 23 | Kansas City | 34 | 72 | 144 | 131 |
| 135 | KMBC | ABC | 23 | Kansas City | 102 | 133 | 88 | 90 |
| 136 | WTVN | ABC | 28 | Columbus | 128 | 130 | 63 | 105 |
| 137 | WVEC | ABC | 44 | Norf-Newp News-Hamp | 137 | 135 | 41 | 95 |
| 138 | WKZO | CBS | 41 | Kalamazoo-Gr Rapids | 108 | 100 | 88 | 142 |
| 139 | WBMG | CBS | 38 | Birmingham | 125 | 117 | 49 | 143 |
| 140 | KOOL | CBS | 45 | Phoenix | 98 | 76 | 140 | 119 |
| 141 | WHBQ | ABC | 29 | Memphis | 138 | 139 | 49 | 111 |
| 142 | KBTV | ABC | 32 | Denver | 91 | 128 | 142 | 42 |
| 143 | WQXI | ABC | 17 | Atlanta | 129 | 126 | 112 | 99 |
| 144 | WCCB | ABC | 35 | Charlotte | 133 | 129 | 81 | 137 |

## II. NEWS AND PUBLIC AFFAIRS

"60 per cent of all Americans over the age of 21 rely on television as their primary source of news." Barry Cole, *Television* (1970).

To argue that Congress intended television to be dedicated summarily to the aggrandizement of the personal or corporate fortunes of its licensees is to argue the absurd. Rather, Congress intended that television frequencies be used to serve the *public*,[1] and any reasonable interpretation of "serving the public" must include equipping them to be better citizens, via the informational programming most often encountered in the rather cumbersome categories known to the Commission as "news," "public affairs" and "other." [2]

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[1] *See* 47 U.S.C. § 307(a)(b). Indeed, the Commission stated early in its development that:

> It is axiomatic that one of the most vital questions of mass communications in a democracy is the development of an informed public opinion through the public dissemination of news and ideas concerning the vital issues of the day . . . It is this right of the public to be informed, rather than any other right on the part of the government, any broadcast licensee or any individual member of the public to broadcast his own particular views of any matter, which is the foundation stone of the American system of broadcasting.

Quoted in Walter Emery, *National and International Systems of Broadcasting,* at 13, Michigan State University Press (1969). For legislative history of the Communications Act, *see* Rosenbloom, "Authority of the Federal Communications Commission," in Coons, ed., *Freedom and Responsibility in Broadcasting* at 96 (1961).

[2] The categories of "news" and "public affairs" are self-explanatory. "Other" programming is described as all programming *not* falling in those two categories or in the categories of "entertainment" or "sports."

The Commission first determined that news and public affairs were "critical programming categories" and began collecting this data in its current form in 1966, when it adopted the license renewal application now in use.[3] But collecting this data and putting it to significant use are two entirely different things, and the practice of this Commission to date has been to make no inquiry whatsoever into a licensee's news, public affairs, and other non-sports, non-entertainment programming, no matter how badly a station had performed, and more than a few stations have been renewed notwithstanding a total failure to deliver programming in one or more of these categories.[4] Even a major television station like WCCO–TV, a Minneapolis CBS affiliate, was renewed automatically in March, 1968, despite *no* public affairs shown during the composite week and only 30 minutes weekly proposed for the future.

Although the Commission has never set standards in its renewal procedures for weighing the news and public affairs data it receives, a 5% news, 1% public affairs and 5% "other" standard thought to be comparable to the minimum diet necessary to stave off complete informational starvation was established and discussed at one time by just two of the seven Commissioners (Cox and Johnson).[5] Since those standards have been so minimal and so easy to comply with, many previously offending broadcasters have made an effort to do so, as can be seen by a glance at the raw data in the three categories.[6] There continues to be some, however, who do not choose even to provide that infinitesimal level of public service, who regularly devote more minutes of time to commercials than to the three informational categories combined; and yet the staff continues to do nothing every two months but provide, as a gesture of courtesy, a compilation of those stations falling below the 5–1–5 standard in each bi-monthly "package" of renewals for the remaining concerned Commissioner to use in his lonely dissents.

The news, public affairs, and other programming information required of a licensee on his renewal application is collected in the form of hours and minutes of air time devoted to each. Of course, quality of programming cannot be determined from this data. It is impossible to tell without actual observation, for example, whether a station's news operation is of the wire service "rip and read" variety or whether there are mobile camera units roaming the city to provide original feeds at all hours. Until such information is available, however, we must rely on what the stations are required to tell the Commission quantitatively about their programming operations. For, although a station broadcasting only 8 hours of news in a 140-hour week may in fact be investing more time, expense, and imagination in its production than one airing 14 hours in the same week, the only presumption we can make is the contrary—the more news, the better the potential for service to the public. We proceed therefore on the assumption that, all other factors being equal, a station running 14 hours of news on a weekly basis better serves the public interest and need than a station running 8 hours. The same reasoning would apply to public affairs and other programming.

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[3] FCC 2d 175 (1966).
[4] See, e.g., *Herman C. Hall*, 11 FCC 2d 344 (1968).
[5] See discussion of these studies at notes 5, 6 and 7 in the Introduction to this Report.
[6] The ten best and ten worst stations in each category may be found in Appendix D.

Another shortcoming of the existing renewal application is that it makes no inquiry into *when* during the broadcast day news, public affairs, and other programming are being aired. It is conceivable, for example, that a station may air one hour of public affairs between 3:30 am and 4:30 am daily and, when this is added to its other public affairs programs, post a total of 10 hours for the week.[7] It should be self-evident, however, that the seven hours of programming in the early morning can be written off as little more than no programming at all, reaching such a small audience as to be of virtually no service to the public. This lacuna in our information must be borne in mind when reviewing these figures, and local program guides or station logs should be consulted to learn the distribution of news, public affairs and other programming in a particular station's broadcast week.

Our ranking of station programming performance is based solely on the hours of programming presented. For the overall ranking of this performance factor, we have simply added together the number of hours and minutes of news, public affairs and other programming presented during the composite week and ranked the stations on the basis of that total. We list the number of hours of each of the three categories separately, and provide a ranking for each. For example, the top station in the overall news-public affairs-"other" ranking, station WPLG, Miami, can be seen to be number 9 in news, number 7 in public affairs and number 12 in other programming. These additional statistics are provided in this chapter because a station's failure to devote substantial time to any one of them is indefensible *whatever* its overall ranking, and such a station should be singled out for further inquiry.[8]

Although the *percentage* of the total programming week devoted by a licensee to each of these categories is available from the station's license renewal form and has been used in similar studies in the past,[9] we have decided in this study to use the raw total of hours. This has been done because the use of percentages, we feel, tends to favor those broadcasters with a shorter broadcast week. For example, a station on the air 120 hours a week with *12* hours of news would be programming 10% news, while a station broadcasting 146 hours a week with *13* hours of news would actually show a *lower* percentage. We feel the additional hours of news programmed by the latter should be given greater credit than the higher percentage of the former, and have acted accordingly.

In addition to the hours of news, public affairs, and other programming broadcast by a station in the composite week, the disparity between a station's promised performance and its actual performance and the decrease (or increase) in performance levels from one renewal period to the next can also be revealing measures of a station's service. Indeed, the Commission has said as much in a few specific

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[7] In addition, many commercial stations will run the same public affairs special more than once, thereby getting credit for two or even three hours of programming for just one show.

[8] WLWI, Indianapolis, for example, was number 26 in its overall news, public affairs and other ranking, due to a fine showing in the latter two categories (32nd and 4th). Its *news* programming, however, placed it an abysmal 127th, thereby clearly delineating an area in which the licensee could improve.

[9] *See* the studies cited in notes 5, 6, and 7 in the Introduction to this Report.

*Network affiliates ranked by total hours of news, Public Affairs, and "Other" in composite week*

| Rank | Call letters | Net. aff. | Mkt. No. | Location | News and rank | | Pub. affairs and rank | | Other and rank | | Composite |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | WPLG | ABC | 18 | Miami | 17.90 | 9 | 11.12 | 7 | 16.82 | 12 | 45.833 |
| 2 | WMAQ | NBC | 3 | Chicago | 19.98 | 4 | 9.10 | 15 | 14.00 | 21 | 43.083 |
| 3 | KNBC | NBC | 2 | Los Angeles | 22.00 | 1 | 10.03 | 9 | 10.78 | 70 | 42.817 |
| 4 | WCBS | CBS | 1 | New York City | 16.13 | 27 | 4.10 | 83 | 21.72 | 1 | 41.950 |
| 5 | WAGA | CBS | 17 | Atlanta | 17.72 | 12 | 4.97 | 59 | 18.92 | 6 | 41.600 |
| 6 | KDKA | CBS | 9 | Pittsburgh | 20.20 | 2 | 7.13 | 31 | 13.50 | 27 | 40.833 |
| 7 | KYW | NBC | 4 | Philadelphia | 18.55 | 6 | 11.43 | 3 | 10.83 | 69 | 40.817 |
| 8 | KNXT | CBS | 2 | Los Anglees | 17.05 | 19 | 4.10 | 83 | 19.63 | 5 | 40.783 |
| 9 | WCAU | CBS | 4 | Philadelphia | 16.37 | 25 | 3.62 | 98 | 20.12 | 3 | 40.100 |
| 10 | WTOP | CBS | 10 | Washington D.C | 17.12 | 17 | 9.92 | 10 | 12.52 | 38 | 39.550 |
| 11 | KMOX | CBS | 12 | St. Louis | 16.25 | 26 | 4.70 | 68 | 18.22 | 8 | 39.167 |
| 12 | WBRC | ABC | 38 | Birmingham | 13.97 | 54 | 6.07 | 39 | 18.72 | 7 | 38.750 |
| 13 | KPIX | CBS | 8 | San Francisco | 16.62 | 23 | 10.72 | 8 | 11.37 | 59 | 38.700 |
| 14 | KCRA | NBC | 27 | Sarcramento-Stockton | 20.15 | 3 | 7.67 | 20 | 10.57 | 77 | 38.383 |
| 15 | WRC | NBC | 10 | Washington D.C | 14.83 | 41 | 9.37 | 13 | 13.78 | 23 | 37.983 |
| 16 | WBZ | NBC | 6 | Boston | 18.53 | 7 | 7.78 | 19 | 11.17 | 65 | 37.483 |
| 17 | WNBC | NBC | 1 | New York City | 15.08 | 39 | 11.13 | 6 | 11.08 | 66 | 37.300 |
| 18 | WBBM | CBS | 3 | Chicago | 14.28 | 49 | 5.57 | 48 | 17.42 | 9 | 37.267 |
| 19 | WBNS | CBS | 28 | Columbus | 13.60 | 55 | 5.60 | 47 | 16.87 | 11 | 36.067 |
| 20 | KFMB | CBS | 49 | San Diego | 19.27 | 5 | 4.22 | 80 | 12.08 | 46 | 35.567 |
| 21 | WBEN | CBS | 25 | Buffalo | 15.90 | 30 | 7.45 | 23 | 12.05 | 48 | 35.400 |
| 22 | KPRC | NBC | 15 | Houston | 15.80 | 32 | 7.32 | 27 | 12.03 | 49 | 35.150 |
| 23 | WHNB | NBC | 22 | Hartford-New Haven | 15.20 | 36 | 6.27 | 36 | 13.55 | 25 | 35.017 |
| 24 | WWL | CBS | 31 | New Orleans | 16.77 | 20 | 5.50 | 49 | 12.70 | 36 | 34.967 |
| 25 | WMAR | CBS | 19 | Baltimore | 15.07 | 40 | 6.33 | 35 | 13.52 | 26 | 34.917 |
| 26 | WLWI | ABC | 14 | Indianapolis | 8.17 | 127 | 6.83 | 32 | 19.83 | 4 | 34.833 |
| 27 | WCKT | NBC | 18 | Miami | 14.37 | 46 | 7.38 | 25 | 12.68 | 37 | 34.433 |
| 28 | WTIC | CBS | 22 | Hartford-New Haven | 13.58 | 56 | 5.18 | 55 | 15.60 | 18 | 34.367 |
| 29 | KOIN | CBS | 26 | Portland | 14.03 | 53 | 3.07 | 117 | 17.25 | 10 | 34.350 |
| 30 | KHOU | CBS | 15 | Houston | 14.65 | 44 | 8.70 | 16 | 10.47 | 83 | 33.817 |
| 31 | WWJ | NBC | 5 | Detroit | 14.80 | 42 | 4.75 | 66 | 13.95 | 22 | 33.500 |
| 31 | WTVT | CBS | 24 | Tampa-St. Petersburg | 16.77 | 20 | 5.22 | 54 | 11.52 | 56 | 33.500 |
| 33 | WBAL | NBC | 19 | Baltimore | 14.07 | 52 | 4.45 | 74 | 14.85 | 19 | 33.367 |
| 34 | KDFW | CBS | 11 | Dallas-Fort Worth | 16.65 | 22 | 3.22 | 113 | 13.45 | 28 | 33.317 |
| 35 | KGW | NBC | 26 | Portland | 16.48 | 24 | 5.73 | 44 | 11.05 | 68 | 33.267 |
| 36 | KXTV | CBS | 27 | Sacramento-Stockton | 17.22 | 16 | 4.07 | 89 | 11.40 | 58 | 32.683 |
| 37 | WOTV | NBC | 41 | Kalamazoo-Gr Rapids | 14.68 | 43 | 6.42 | 34 | 11.53 | 55 | 32.633 |
| 38 | WFMY | CBS | 48 | Gnsb-High Pt-Win Sal | 12.82 | 67 | 3.87 | 92 | 15.82 | 16 | 32.500 |
| 39 | WRTV | NBC | 14 | Indianapolis | 12.62 | 69 | 7.47 | 22 | 12.33 | 43 | 32.417 |
| 40 | WMAL | ABC | 10 | Washington D.C | 10.43 | 101 | 7.67 | 20 | 14.25 | 20 | 32.350 |
| 41 | WNAC | ABC | 6 | Boston | 11.43 | 84 | 11.17 | 4 | 9.38 | 95 | 31.983 |
| 42 | WLWD | NBC | 39 | Dayton | 11.83 | 74 | 7.92 | 18 | 12.08 | 46 | 31.833 |
| 43 | WJW | CBS | 7 | Cleveland | 11.57 | 81 | 3.43 | 104 | 16.70 | 13 | 31.700 |
| 43 | WLCY | ABC | 24 | Tampa-St. Petersburg | 8.08 | 129 | 7.38 | 25 | 16.23 | 15 | 31.700 |
| 45 | WZZM | ABC | 41 | Kalamazoo-Gr Rapids | 6.25 | 137 | 4.30 | 79 | 21.12 | 2 | 31.667 |
| 46 | WAPI | NBC | 38 | Birmingham | 15.63 | 33 | 4.90 | 60 | 11.08 | 66 | 31.617 |
| 47 | WJAR | NBC | 34 | Providence | 13.35 | 63 | 7.40 | 24 | 10.53 | 79 | 31.283 |

*Network affiliates ranked by total hours of news, Public Affairs, and "Other" in composite week*—Continued

| Rank | Call letters | Net. aff. | Mkt. No. | Location | News and rank | | Pub. affairs and rank | | Other and rank | | Composite |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 48 | KING | NBC | 16 | Seattle-Tacoma | 13.48 | 61 | 4.50 | 72 | 13.25 | 32 | 31.233 |
| 49 | WCPO | CBS | 20 | Cincinnati | 11.27 | 88 | 3.28 | 110 | 16.52 | 14 | 31.067 |
| 50 | WBAP | NBC | 11 | Dallas-Fort Worth | 15.02 | 29 | 7.22 | 30 | 7.90 | 118 | 31.033 |
| 51 | WFLA | NBC | 24 | Tampa-St. Petersburg | 16.10 | 28 | 2.98 | 119 | 11.85 | 52 | 30.933 |
| 52 | WBTV | CBS | 35 | Charlotte | 15.13 | 38 | 3.30 | 108 | 12.40 | 41 | 30.833 |
| 53 | WIIC | NBC | 9 | Pittsburgh | 17.55 | 13 | 4.83 | 62 | 8.40 | 110 | 30.783 |
| 54 | WAVY | NBC | 44 | Norf-Newp News-Hamp | 13.50 | 58 | 8.15 | 17 | 9.10 | 99 | 30.750 |
| 55 | WDSU | NBC | 31 | New Orleans | 17.12 | 17 | 4.53 | 71 | 9.10 | 99 | 30.750 |
| 56 | WSB | NBC | 17 | Atlanta | 17.40 | 15 | 4.10 | 83 | 9.22 | 97 | 30.717 |
| 57 | WSPA | CBS | 40 | Gnville-Sptnbg-Ashvi | 11.32 | 87 | 3.57 | 100 | 15.62 | 17 | 30.500 |
| 58 | WSAZ | NBC | 33 | Charleston-Huntington | 14.37 | 46 | 5.38 | 51 | 10.73 | 71 | 30.483 |
| 59 | WJZ | ABC | 19 | Baltimore | 11.58 | 79 | 11.90 | 2 | 6.85 | 133 | 30.333 |
| 60 | WTAE | ABC | 9 | Pittsburgh | 11.82 | 75 | 9.63 | 12 | 8.75 | 104 | 30.200 |
| 61 | WLS | ABC | 3 | Chicago | 9.50 | 114 | 7.25 | 28 | 13.43 | 30 | 30.183 |
| 62 | WPVI | ABC | 4 | Philadelphia | 9.32 | 117 | 9.25 | 14 | 11.50 | 57 | 30.067 |
| 63 | WFBC | NBC | 40 | Gnville-Sptnbg-Ashvi | 11.33 | 86 | 7.23 | 29 | 11.35 | 60 | 29.917 |
| 64 | KTAR | NBC | 45 | Phoenix | 17.85 | 10 | 6.27 | 36 | 5.67 | 140 | 29.783 |
| 65 | WISH | CBS | 14 | Indianapolis | 18.42 | 8 | 2.50 | 126 | 8.67 | 107 | 29.583 |
| 66 | KOMO | ABC | 16 | Seattle-Tacoma | 12.88 | 66 | 5.30 | 53 | 11.32 | 61 | 29.500 |
| 66 | WLWC | NBC | 28 | Columbus | 9.33 | 116 | 9.67 | 11 | 10.50 | 80 | 29.500 |
| 68 | KSD | NBC | 12 | St. Louis | 17.47 | 14 | 6.05 | 40 | 5.98 | 138 | 29.500 |
| 69 | KCMO | CBS | 23 | Kansas City | 11.72 | 77 | 3.93 | 90 | 13.62 | 24 | 29.267 |
| 70 | KGO | ABC | 8 | San Francisco | 10.05 | 107 | 11.15 | 5 | 7.80 | 121 | 29.000 |
| 70 | WIOL | CBS | 45 | Toledo | 13.37 | 62 | 2.35 | 133 | 13.28 | 31 | 29.000 |
| 72 | WDAF | NBC | 23 | Kansas City | 17.75 | 11 | 4.18 | 81 | 6.88 | 132 | 28.817 |
| 73 | KMGH | CBS | 32 | Denver | 11.58 | 79 | 4.32 | 78 | 12.82 | 35 | 28.717 |
| 74 | WCCO | CBS | 13 | Minneapolis-St. Paul | 13.50 | 58 | 3.88 | 91 | 11.20 | 63 | 28.583 |
| 75 | WSOC | NBC | 35 | Charlotte | 13.50 | 58 | 4.77 | 65 | 10.18 | 86 | 28.450 |
| 76 | KOOL | CBS | 45 | Phoenix | 15.33 | 34 | 2.52 | 125 | 10.57 | 77 | 28.417 |
| 77 | WABC | ABC | 1 | New York City | 10.58 | 98 | 5.37 | 52 | 12.42 | 40 | 28.367 |
| 77 | WKY | NBC | 41 | Oklahoma City | 14.58 | 45 | 5.88 | 42 | 7.90 | 118 | 28.367 |
| 79 | KOA | NBC | 32 | Denver | 14.32 | 48 | 6.17 | 38 | 7.87 | 120 | 28.350 |
| 80 | WMC | NBC | 29 | Memphis | 15.82 | 31 | 5.13 | 57 | 7.33 | 127 | 28.283 |
| 81 | WTNH | ABC | 22 | Hartford-New Haven | 8.87 | 121 | 12.92 | 1 | 6.43 | 136 | 28.217 |
| 82 | KWTV | CBS | 41 | Oklahoma City | 12.25 | 72 | 3.55 | 101 | 12.22 | 44 | 28.017 |
| 83 | KIRO | CBS | 16 | Seattle-Tacoma | 14.23 | 50 | 4.40 | 76 | 9.15 | 98 | 27.783 |
| 84 | WHAS | CBS | 36 | Louisville | 15.27 | 35 | 1.08 | 143 | 11.23 | 62 | 27.583 |
| 85 | WAVE | NBC | 36 | Louisville | 11.47 | 82 | 4.08 | 86 | 12.00 | 51 | 27.550 |
| 86 | WKYC | NBC | 7 | Cleveland | 11.73 | 76 | 5.15 | 56 | 10.62 | 75 | 27.500 |
| 87 | WTVJ | CBS | 18 | Miami | 12.05 | 73 | 5.07 | 58 | 10.23 | 85 | 27.350 |
| 88 | WOAI | NBC | 45 | San Antonio | 15.17 | 37 | 6.75 | 33 | 5.42 | 141 | 27.333 |
| 89 | WHEN | CBS | 43 | Syracuse | 11.37 | 85 | 3.73 | 96 | 12.17 | 45 | 27.267 |
| 90 | KSL | CBS | 50 | Salt Lake City | 10.57 | 99 | 3.77 | 95 | 12.92 | 34 | 27.250 |
| 91 | KSTP | NBC | 13 | Minneapolis-St. Paul | 14.10 | 51 | 5.62 | 46 | 7.33 | 127 | 27.050 |
| 92 | WIMJ | NBC | 21 | Milwaukee | 12.40 | 71 | 4.08 | 86 | 10.50 | 80 | 26.983 |
| 93 | KFNS | CBS | 45 | San Antonio | 12.82 | 67 | 3.10 | 116 | 10.72 | 72 | 26.633 |
| 94 | WPRI | CBS | 34 | Providence | 12.98 | 65 | 4.70 | 68 | 8.10 | 115 | 25.783 |

| | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 95 | KIRK | ABC | 15 | Houston | 10.97 | 91 | 4.85 | 61 | 9.82 | 89 | 25.633 |
| 96 | KATU | ABC | 26 | Portland | 10.85 | 94 | 2.83 | 120 | 11.83 | 53 | 25.517 |
| 97 | WSM | NBC | 30 | Nashville | 13.00 | 64 | 4.35 | 77 | 8.17 | 113 | 25.517 |
| 98 | WISN | CBS | 21 | Milwaukee | 10.23 | 104 | 2.80 | 121 | 12.35 | 42 | 25.383 |
| 99 | WJBK | CBS | 5 | Detroit | 10.05 | 107 | 3.28 | 110 | 12.02 | 50 | 25.350 |
| 100 | WKZO | CBS | 41 | Kalamazoo-Gr Rapids | 8.58 | 124 | 3.30 | 108 | 13.45 | 28 | 25.333 |
| 101 | WLAC | CBS | 30 | Nashville | 10.83 | 95 | 2.33 | 134 | 11.83 | 53 | 25.000 |
| 102 | KGTV | NBC | 49 | San Diego | 13.57 | 57 | 4.50 | 72 | 6.77 | 131 | 24.833 |
| 103 | WTEN | CBS | 37 | Albany-Schenectady-T | 10.62 | 97 | 3.20 | 114 | 10.65 | 74 | 24.467 |
| 104 | KUTV | NBC | 50 | Salt Lake City | 10.32 | 102 | 5.98 | 41 | 8.12 | 114 | 24.417 |
| 105 | WXII | NBC | 48 | Gnsb-High Pt-Win Sal | 10.88 | 93 | 4.45 | 74 | 8.93 | 102 | 24.267 |
| 106 | WKBW | ABC | 25 | Buffalo | 8.75 | 123 | 5.82 | 43 | 9.67 | 93 | 24.233 |
| 107 | WHTN | ABC | 33 | Charleston-Huntington | 10.22 | 105 | 3.48 | 103 | 10.50 | 80 | 24.200 |
| 108 | WREC | CBS | 29 | Memphis | 11.05 | 89 | 4.17 | 82 | 8.75 | 104 | 23.967 |
| 109 | WGR | NBC | 25 | Buffalo | 10.50 | 100 | 4.63 | 70 | 8.45 | 109 | 23.583 |
| 110 | WTEV | ABC | 34 | Providence | 11.63 | 78 | 5.65 | 45 | 6.22 | 137 | 23.500 |
| 111 | WITI | ABC | 21 | Milwaukee | 9.55 | 113 | 3.43 | 104 | 10.40 | 84 | 23.383 |
| 112 | WVUE | ABC | 31 | New Orleans | 10.08 | 106 | 3.32 | 107 | 9.90 | 87 | 23.300 |
| 113 | WSPD | NBC | 45 | Toledo | 9.68 | 111 | 2.50 | 126 | 11.10 | 65 | 23.283 |
| 114 | WFAA | ABC | 11 | Dallas-Fort Worth | 12.62 | 69 | 3.25 | 112 | 7.17 | 131 | 23.033 |
| 115 | KABC | ABC | 2 | Los Angeles | 9.75 | 110 | 4.83 | 62 | 8.38 | 111 | 22.967 |
| 116 | WXYZ | ABC | 5 | Detroit | 10.30 | 103 | 3.82 | 93 | 8.75 | 104 | 22.867 |
| 117 | WBMG | CBS | 38 | Birmingham | 7.73 | 132 | 5.40 | 50 | 9.50 | 94 | 22.633 |
| 118 | WLWT | NBC | 20 | Cincinnati | 11.00 | 90 | 3.42 | 106 | 7.92 | 117 | 22.333 |
| 119 | WAST | ABC | 37 | Albany-schenectady-T | 9.22 | 119 | 3.73 | 96 | 9.30 | 96 | 22.250 |
| 120 | KOVR | ABC | 27 | Sacramento-Stockton | 9.57 | 112 | 1.80 | 142 | 10.67 | 73 | 22.033 |
| 121 | WRGB | NBC | 37 | Albany-Schenectady-T | 11.47 | 82 | 3.00 | 118 | 7.38 | 126 | 21.850 |
| 122 | KTVK | ABC | 45 | Phoenix | 9.50 | 114 | 4.83 | 62 | 7.28 | 129 | 21.617 |
| 123 | WHIO | CBS | 39 | Dayton | 8.38 | 125 | 2.45 | 130 | 10.60 | 76 | 21.433 |
| 124 | KOCO | ABC | 41 | Oklahoma City | 8.00 | 130 | 3.58 | 99 | 9.70 | 92 | 21.283 |
| 125 | WSIX | ABC | 30 | Nashville | 5.35 | 141 | 2.65 | 122 | 12.95 | 33 | 20.950 |
| 126 | WQXI | ABC | 17 | Atlanta | 9.22 | 119 | 4.08 | 86 | 7.22 | 130 | 20.517 |
| 127 | WSYR | NBC | 43 | Syracuse | 9.25 | 118 | 3.55 | 101 | 7.47 | 125 | 20.267 |
| 128 | KBTV | ABC | 32 | Denver | 9.97 | 109 | 3.20 | 114 | 6.55 | 135 | 19.717 |
| 129 | WCCB | ABC | 35 | Charlotte | 5.08 | 142 | 1.90 | 141 | 12.52 | 38 | 19.500 |
| 130 | WTVN | ABC | 28 | Columbus | 7.42 | 133 | 2.20 | 136 | 9.80 | 90 | 19.417 |
| 131 | KSAT | ABC | 45 | San Antonio | 10.95 | 92 | 3.80 | 94 | 4.27 | 144 | 19.017 |
| 132 | WCHS | CBS | 33 | Charleston-Huntington | 8.85 | 122 | 2.00 | 139 | 7.97 | 116 | 18.817 |
| 133 | KMBC | ABC | 23 | Kansas City | 7.37 | 134 | 2.40 | 132 | 8.98 | 101 | 18.750 |
| 134 | WEWS | ABC | 7 | Cleveland | 8.12 | 128 | 2.03 | 137 | 8.35 | 112 | 18.500 |
| 135 | WVEC | ABC | 44 | Norf-Newp News-Hamp | 10.63 | 96 | 2.43 | 131 | 5.27 | 142 | 18.333 |
| 136 | KCPX | ABC | 50 | Salt Lake City | 6.00 | 139 | 4.75 | 66 | 7.53 | 124 | 18.283 |
| 137 | WLOS | ABC | 40 | Gnville-Sptnbg-Ashvl | 8.00 | 130 | 2.62 | 123 | 7.58 | 123 | 18.200 |
| 138 | WKRC | ABC | 20 | Cincinnati | 5.88 | 140 | 2.50 | 126 | 9.78 | 91 | 18.167 |
| 139 | WHBQ | ABC | 29 | Memphis | 6.47 | 136 | 2.33 | 134 | 8.87 | 103 | 17.667 |
| 140 | KTVI | ABC | 12 | St. Louis | 6.15 | 138 | 2.55 | 124 | 8.67 | 107 | 17.367 |
| 141 | KMSP | ABC | 13 | Minneapolis-St. Paul | 8.20 | 126 | 2.03 | 137 | 5.68 | 139 | 15.917 |
| 142 | WLKY | ABC | 36 | Louisville | 4.53 | 143 | 2.47 | 129 | 7.73 | 122 | 14.733 |
| 143 | WNYS | ABC | 43 | Syracuse | 6.55 | 135 | 1.93 | 140 | 5.12 | 143 | 13.600 |
| 144 | WDHO | ABC | 45 | Toledo | 1.67 | 144 | 83 | 144 | 9.90 | 87 | 12.400 |

instances in the past.[10] And even the current Commission, which at one time or another has indicated that it favors the total elimination of *existing* Commission programming standards, concedes that a station's "promise vs. performance" is a valid indication of its performance in the public interest.[11] While we have not attempted, due to the length of this study, to relate the licensees' most recent performance to either his current or his previous promises, the necessary information is readily available, in the licensee's public file or at the FCC for those who are interested.

*Public Service Announcements*

In addition to requiring information with respect to news, public affairs, and other programming, the FCC requires that stations report the number of public service announcements (psa's) aired during the composite week and the number proposed to be aired during an average week in the future renewal period. While the broadcasting of psa's is one measure of a station's performance in the public interest, the Commission, in common with the data it receives on news, public affairs, and other programming, has never attempted to set "psa standards" at renewal time, for the purpose of evaluating licensee performance.[12]

Although we believe that the quantity of psa's broadcast by a station in any given week is a measure of its performance in the public interest, it must be recognized that the number by itself reveals very little about a station's performance. In point of fact, what the figure does not reveal may be even more significant than what it does.

The figure does *not* disclose, for example, how the psa's are distributed during a typical broadcast day. Because they are aired free of charge it is likely that a station will run them most frequently during the hours when its rates are lowest and it sells the least commercial time—i.e., late night and early morning. The natural tendency, given that television as presently constituted is a profit-maximizing enterprise, is to broadcast psa's in the hours when air time is cheapest and, accordingly, audiences smallest. To run a sixty-second psa during prime time will ordinarily cost a station hundreds of dollars in lost revenue, whereas running it at 2:30 am entails either no loss (because the time could not be sold) or a loss of considerably smaller magnitude. Notwithstanding, therefore, that a station may be presenting large numbers of psa's during any given week, their effect and value will be marginal if they appear predominantly at those times when television audiences are smallest.

Not only does the present renewal application not disclose the distribution of psa's, but it also does not disclose their length. Although a psa of ten seconds duration may on occasion be just as effective as one of sixty seconds, it is likely that a station running five- and ten-second psa's exclusively is doing so solely in order to lose as little revenue as possible and is therefore indiscriminately rejecting all announcements of greater length. This practice is manifestly not consonant with station performance in the public interest.

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[10] *See, e.g., WKBN Broadcasting Corp.*, 30 FCC 2d 958, 975 (1971); *Southern Broadcasting Co.*, 26 FCC 2d 998 (1970); *WMOZ, Inc.*, 36 FCC 201, 241 (1964); and *KORD, Inc.*, 31 FCC 85, 88 (1961).

[11] See Letter from Clay T. Whitehead, Director of Office of Telecommunications Policy, to Rep. Carl Albert, March 13, 1973.

[12] Indeed, Deputy Broadcast Bureau Chief Harold Kassens, in noting that some licensees even fail to fill in this blank on their application, said "It doesn't matter whether they run one or 1000 . . . we're not going to do anything about it. . . ."

Finally, the renewal application does not require that a licensee disclose the source of psa's. Licensees have a Congressional mandate to serve the public interest, convenience, and necessity of their local communities, and it necessarily follows that psa's should be well-suited to this task. Although national organizations are fully entitled to free time for psa's, service to the local community is the *raison d'etre* of a television station, hence locally produced announcements ought to be given preferred treatment. When a station airs only professionally produced announcements from national organizations (e.g., Heart Association, the U.S. Army or CARE), because they are better-sounding or appearing or easier to broadcast for technical reasons, or because they are less hard-hitting and controversial (having been cleared by the Advertising Council), it can scarcely be maintained that the local community is being as well served as it would be by announcements regarding even a local blood drive or a library fund-raising event—not to mention more controversial local issues. Unfortunately, the present renewal application does not reveal whether or not such treatment is in fact being accorded locally originated psa's, and determination of that, as well as the time and duration of announcements, must be left to the monitoring techniques of concerned local organizations.

Notwithstanding these substantial shortcomings, the number of announcements listed on the renewal applications does give some indication of service to the public. We do feel that the station with 450 psa's and the station with but 50 both deserve to have that fact noted in our study. Accordingly, we present below a ranking based solely on the number of psa's. Because of the defects in these numbers which we have just discussed, however, we have not included this factor in our final composite ranking.

*Network Affiliates Ranked by Number of Public Service Announcements in Composite Week*

| Rank | Call letters | Net. aff. | Mkt. No. | Location | PSA's |
|---|---|---|---|---|---|
| 1 | WKY | NBC | 41 | Oklahoma City | 572 |
| 2 | WJZ | ABC | 19 | Baltimore | 495 |
| 3 | KYW | NBC | 4 | Philadelphia | 464 |
| 4 | WLCY | ABC | 24 | Tampa-St. Petersburg | 462 |
| 5 | KOIN | CBS | 26 | Portland | 446 |
| 6 | WIVT | CBS | 24 | Tampa-St. Petersburg | 386 |
| 7 | WJAR | NBC | 34 | Providence | 369 |
| 8 | KWTV | CBS | 41 | Oklahoma City | 365 |
| 9 | KDKA | CBS | 9 | Pittsburgh | 364 |
| 10 | WPVI | ABC | 4 | Philadelphia | 348 |
| 11 | KOOL | CBS | 45 | Phoenix | 336 |
| 12 | KPRC | NBC | 15 | Houston | 327 |
| 13 | WTIC | CBS | 22 | Hartford-New Haven | 326 |
| 14 | KPIX | CBS | 8 | San Francisco | 317 |
| 14 | WBNS | CBS | 28 | Columbus | 317 |
| 16 | WTAE | ABC | 9 | Pittsburgh | 309 |
| 17 | WBZ | NBC | 6 | Boston | 300 |
| 17 | WMAL | ABC | 10 | Washington, D.C | 300 |
| 17 | WAPI | NBC | 38 | Birmingham | 300 |
| 20 | WAVY | NBC | 44 | Norf-Newp News-Hamp | 297 |
| 21 | WBAL | NBC | 19 | Baltimore | 290 |
| 22 | WCBS | CBS | 1 | New York City | 287 |
| 22 | WNAC | ABC | 6 | Boston | 287 |
| 24 | WZZM | ABC | 41 | Kalamazoo-Gr Rapids | 286 |
| 25 | KOMO | ABC | 16 | Seattle-Tacoma | 285 |
| 26 | WRGB | NBC | 37 | Albany-Schenectady-T | 281 |
| 27 | WSYR | NBC | 43 | Syracuse | 272 |
| 28 | WINH | ABC | 22 | Hartford-New Haven | 270 |

*Network Affiliates Ranked by Number of Public Service Announcements*—Con.

| Rank | Call letters | Net. aff. | Mkt. No. | Location | PSA's |
|---|---|---|---|---|---|
| 29 | KCPX | ABC | 50 | Salt Lake City | 269 |
| 30 | WBAP | NBC | 11 | Dallas-Fort Worth | 265 |
| 31 | WKBW | ABC | 25 | Buffalo | 263 |
| 32 | KGW | NBC | 26 | Portland | 262 |
| 33 | WTEV | ABC | 34 | Providence | 259 |
| 33 | KOCO | ABC | 41 | Oklahoma City | 259 |
| 35 | WBEN | CBS | 25 | Buffalo | 258 |
| 36 | WLWT | NBC | 20 | Cincinnati | 256 |
| 37 | KFMB | CBS | 49 | San Diego | 251 |
| 38 | WCAU | CBS | 4 | Philadelphia | 247 |
| 38 | WOAI | NBC | 45 | San Antonio | 247 |
| 40 | WTOP | CBS | 10 | Washington, D.C | 246 |
| 41 | WMAR | CBS | 19 | Baltimore | 245 |
| 41 | WKRC | ABC | 20 | Cincinnati | 245 |
| 43 | KABC | ABC | 2 | Los Angeles | 243 |
| 44 | WQXI | ABC | 17 | Atlanta | 242 |
| 45 | KDFW | CBS | 11 | Dallas-Fort Worth | 241 |
| 45 | KSD | NBC | 12 | St. Louis | 241 |
| 45 | WCKT | NBC | 18 | Miami | 241 |
| 48 | WAST | ABC | 37 | Albany-Schenectady-T | 238 |
| 49 | KMOX | CBS | 12 | St. Louis | 237 |
| 50 | WLWI | ABC | 14 | Indianapolis | 235 |
| 51 | KMGH | CBS | 32 | Denver | 234 |
| 52 | WTEN | CBS | 37 | Albany-Schenectady-T | 231 |
| 52 | WBBM | CBS | 3 | Chicago | 231 |
| 54 | WFLA | NBC | 24 | Tampa-St. Petersburg | 230 |
| 54 | KATU | ABC | 26 | Portland | 230 |
| 56 | WPLG | ABC | 18 | Miami | 226 |
| 56 | WIIC | NBC | 9 | Pittsburgh | 226 |
| 58 | WISN | CBS | 21 | Milwaukee | 224 |
| 59 | WHTN | ABC | 33 | Charleston-Huntington | 221 |
| 60 | KHOU | CBS | 15 | Houston | 218 |
| 61 | KOA | NBC | 32 | Denver | 216 |
| 62 | WABC | ABC | 1 | New York City | 214 |
| 63 | WBTV | CBS | 35 | Charlotte | 212 |
| 64 | KENS | CBS | 45 | San Antonio | 211 |
| 65 | WNBC | NBC | 1 | New York City | 207 |
| 65 | WHAS | CBS | 36 | Louisville | 207 |
| 67 | WFAA | ABC | 11 | Dallas-Fort Worth | 204 |
| 67 | WISH | CBS | 14 | Indianapolis | 204 |
| 69 | WGR | NBC | 25 | Buffalo | 203 |
| 69 | WCHS | CBS | 33 | Charleston-Huntington | 203 |
| 71 | WJW | CBS | 7 | Cleveland | 200 |
| 72 | WVUE | ABC | 31 | New Orleans | 198 |
| 73 | WNYS | ABC | 43 | Syracuse | 197 |
| 74 | KXTV | CBS | 27 | Sacramento-Stockton | 195 |
| 74 | WOTV | NBC | 41 | Kalamazoo-Gr Rapids | 195 |
| 76 | WTVN | ABC | 28 | Columbus | 194 |
| 77 | KCRA | NBC | 27 | Sacramento-Stockton | 192 |
| 78 | WSB | NBC | 17 | Atlanta | 191 |
| 79 | WLWD | NBC | 39 | Dayton | 188 |
| 80 | WMC | NBC | 29 | Memphis | 186 |
| 81 | WDAF | NBC | 23 | Kansas City | 185 |
| 81 | WBRC | ABC | 38 | Birmingham | 185 |
| 83 | WWJ | NBC | 5 | Detroit | 184 |
| 83 | WAVE | NBC | 36 | Louisville | 184 |
| 85 | KNXT | CBS | 2 | Los Angeles | 183 |
| 85 | WFBC | NBC | 40 | Gnville-Sptnbg-Ashvi | 183 |
| 87 | WLS | ABC | 3 | Chicago | 182 |
| 88 | WKYC | NBC | 7 | Cleveland | 179 |
| 88 | WRTV | NBC | 14 | Indianapolis | 179 |
| 88 | KTAR | NBC | 45 | Phoenix | 179 |
| 91 | WLWC | NBC | 28 | Columbus | 177 |
| 91 | WSAZ | NBC | 33 | Charleston-Huntington | 177 |
| 91 | WVEC | ABC | 44 | Norf-Newp News-Hamp | 177 |
| 91 | WFMY | CBS | 48 | Gnsb-High Pt-Win Sal | 177 |
| 95 | WWL | CBS | 31 | New Orleans | 176 |
| 96 | WRC | NBC | 10 | Washington D.C | 173 |
| 97 | KMBC | ABC | 23 | Kansas City | 172 |
| 97 | KOVR | ABC | 27 | Sacramento-Stockton | 172 |
| 99 | KNBC | NBC | 2 | Los Angeles | 169 |
| 100 | WAGA | CBS | 17 | Atlanta | 166 |
| 101 | WMAQ | NBC | 3 | Chicago | 165 |
| 101 | KTRK | ABC | 15 | Houston | 165 |
| 103 | WTOL | CBS | 45 | Toledo | 163 |
| 104 | WSPA | CBS | 40 | Gnville-Sptnbg-Ashvi | 162 |
| 105 | WPRI | CBS | 34 | Providence | 159 |
| 106 | KGO | ABC | 8 | San Francisco | 155 |

*Network Affiliates Ranked by Number of Public Service Announcements*—Con.

| Rank | Call letters | Net. aff. | Mkt. No. | Location | PSA's |
|---|---|---|---|---|---|
| 106 | KUTV | NBC | 50 | Salt Lake City | 155 |
| 108 | WSPD | NBC | 45 | Toledo | 154 |
| 109 | KCMO | CBS | 23 | Kansas City | 151 |
| 109 | WSOC | NBC | 35 | Charlotte | 151 |
| 111 | KTVK | ABC | 45 | Phoenix | 150 |
| 112 | WXII | NBC | 48 | Gnsp-High Pt-Win Sal | 149 |
| 112 | WTVJ | CBS | 18 | Miami | 149 |
| 112 | WCCB | ABC | 35 | Charlotte | 149 |
| 115 | WHEN | CBS | 43 | Syracuse | 148 |
| 116 | WCCO | CBS | 13 | Minneapolis-St Paul | 147 |
| 117 | WDHO | ABC | 45 | Toledo | 146 |
| 118 | KSL | CBS | 50 | Salt Lake City | 135 |
| 119 | WBMG | CBS | 38 | Birmingham | 134 |
| 120 | WIII | ABC | 21 | Milwaukee | 133 |
| 121 | KGIV | NBC | 49 | San Diego | 132 |
| 122 | KMSP | ABC | 13 | Minneapolis-St. Paul | 130 |
| 123 | KBTV | ABC | 32 | Denver | 129 |
| 124 | WEWS | ABC | 7 | Cleveland | 127 |
| 125 | WLOS | ABC | 40 | Gnville-Sptnbg-Ashvi | 126 |
| 126 | KSIP | NBC | 13 | Minneapolis-St. Paul | 124 |
| 127 | WCPO | CBS | 20 | Cincinnati | 121 |
| 128 | KSAT | ABC | 45 | San Antonio | 115 |
| 129 | WKZO | CBS | 41 | Kalamazoo-Gr Rapids | 114 |
| 130 | WLKY | ABC | 36 | Louisville | 112 |
| 131 | WREC | CBS | 29 | Memphis | 112 |
| 132 | WJBK | CBS | 5 | Detroit | 110 |
| 133 | KING | NBC | 16 | Seattle-Tacoma | 109 |
| 134 | WHBQ | ABC | 29 | Memphis | 107 |
| 135 | WTMJ | NBC | 21 | Milwaukee | 103 |
| 136 | WDSU | NBC | 31 | New Orleans | 98 |
| 137 | KTVI | ABC | 12 | St. Louis | 86 |
| 138 | WSIX | ABC | 30 | Nashville | 84 |
| 139 | WLAC | CBS | 30 | Nashville | 84 |
| 140 | KIRO | CBS | 16 | Seattle-Tacoma | 83 |
| 141 | WXYZ | ABC | 5 | Detroit | 81 |
| 142 | WSM | NBC | 30 | Nashville | 75 |
| 143 | WHIO | CBS | 39 | Dayton | 60 |
| 144 | WHNB | NBC | 22 | Hartford-New Haven | 0 |

## III. COMMERCIALIZATION

Public concern with the amount and character of broadcast advertising was recognized as early as 1922 when Herbert Hoover, then Secretary of Commerce and in charge of radio regulation, said: "It is inconceivable that we should allow so great a possibility for service, for news, for entertainment, for education and for vital commercial purposes to be drowned in advertising chatter." [13]

In 1960 the FCC said that broadcast licensees have an obligation "to avoid abuses with respect to the total amount of time devoted to advertising continuity as well as the frequency with which regular programs are interrupted for advertising messages." [14] The problem, however, is that the Commission has never done anything concrete about overcommercialization, because its knee-jerk response tends to be to protect the industrys profits rather than the public interest.

In 1963, for example, the Commission tentatively announced that it would attempt to propose the adoption of rules requiring all broadcast licensees to observe the limitations on advertising contained in the industrys own self-regulatory handbook, the National Association of Broadcasters Code of Good Practices.[15] Those limitations, which can be ignored by broadcasters if they choose, today would include 9½ minutes per hour of commercials in prime time and 16 minutes at all other times *except* children's weekend programming, from 7:00 am to 2:00 pm Saturday and Sunday, which has recently been limited to 12 minutes per hour.

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[13] *Hearings Before Communications Subcommittee of Committee on Interstate and Foreign Commerce on H.R. 8316, H.R. 8318, H.R. 8729, H.R. 8896, H.R. 8980, H.R. 9042* at 37 (Nov. 6, 1963).

[14] *Id.*

[15] See the comprehensive discussion of this rulemaking and its ultimate demise in Krasnow and Longley, *The Politics of Broadcast Regulations* 105–111 (1973).

Needless to say, the industry outcry to the suggestion was as rapid as it was furious, and the Commission quickly backed off with a 1964 promise to continue to develop its policy on commercialization on a case by case basis.[16] Broadcasting Magazine, always privy to the Commissions innermost thoughts and processes, assured the industry in July of 1964 that only the most extreme cases of overcommercialization would ever be brought to the Commission's attention.[17]

The basic assumption used in applying the commercialization factor in the final ranking of our study is that the greater the emphasis on commercials (the more the commercial time) the worse the station is performing. While recognizing the current need of the broadcaster to protect his financial self-interest (and that of his stockholders), we have attempted to balance that self-interest against the needs of the viewing public in determining the relative service of each affiliate in the study. Moreover, we are not convinced that greater service to the public, via fewer commercials, necessarily means less revenue to the broadcaster. An advertising executive concerned about the value of his commercial product recently screened for his colleagues a single "clutter clip" spanning the even minute period between the end of one prime time network show and the beginning of the next, in which he counted no fewer than thirty-five separate "messages" to the viewer! Surely, if fewer "minutes" of commercial time are made available, as a service to the public, the advertiser will be willing to pay a higher price for the greater exclusivity he is buying.

This theory is at least partially borne out by the variety of international experiences in setting commercial limitations. In Germany, for example, advertisers willingly pay more for one of the twenty minutes of commercials allowed per *day* than they would if commercials were appearing at a rate of 12 or 16 minutes per hour. Such advertising, moreover, is strictly limited to the 6–8 pm portion of German "prime time," in which the normally varied German television fare is given over to—you guessed it!—American series reruns. Other international standards included those of France which, in 1968, only allowed a total of 2 minutes of advertising per day. Newer rulings, however, allow 5 minutes of advertising on one channel and 15 minutes on another. Canada limits commercial time to 7 minutes per hour segment and also places a limit on the amount of advertisements during any 15 minute period to 5 in number and 4 minutes of total time.

The extent of the Commission regulation of commercials at the present time is "the 18 month letter" which is sent to all television licensees who propose in their renewal applications to exceed 16 minutes of commercial matter per hour. In response to this letter the applicant must give information on complaints, total number of hours in excess of 16 minutes of commercial time, and defenses of the station's policies in terms of community and public interest. The "18 month letter" amounts only to a doubt expressed by the Commission that the licensee is not meeting the public interest in commercialization—a "doubt" involving as little actual sanction as does the NAB Code.

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[16] *Id.*, at 107. The Commission found its ground cut out from under it by a concerted broadcaster assault on Congress which led to hearings on a bill "to prohibit the Commission from adopting any rules governing the length or frequency of broadcast ads." When the bill overwhelmingly passed the House (before dying in the Senate) the Commission seemed to get the "message" and allowed its rulemaking to expire without coming to any results.

[17] "FCC Again Rebuff's Chairman," *Broadcasting*, July 27, 1969, at 34.

The data gathered in the course of this study was limited to the resources available, namely the license renewal form 303 filed by the licensee. Form 303, Section IV–B, Part IV asks the applicant to list past commercial practices and Part V asks for proposed commercial practices including the following questions: "What is the maximum amount of commercial matter in any 60 minute segment which the applicant proposes normally to allow? If the applicant proposes to permit this amount to be exceeded at times, state under what circumstances and how often this is expected to occur, and the limits that would then apply." The form fails, however, to request a breakdown of commercialization in prime time and non prime-time hours. Nor does it require submission of crucial information on program interruption or other matters, such as loudness violations.[18]

The license renewal application requests the licensee to submit the number of 60 minute segments which fall into four categories: (A) up to and including 8 minutes; (B) over 8 and up to and including 12 minutes; (C) over 12 and up to and including 16 minutes; (D) over 16 minutes. We concluded that the categories (C) and (D) (over 12–16, and over 16) were most significant for our study; 12 minutes of commercials per hour means that the public is being subjected to commercials at a rate of one hour out of every five, or 20% of all broadcasting time, and is a useful maximum limit. Such commercialization would violate even the industry's own standards in prime time and during children's programming. We find no justification for giving any weight at all to the NAB's 16 minute non-prime time standard.

The total column and the ranking column in the commercialization table will indicate the number of 60 minute segments in which 12 or more commercial minutes appeared during the composite week: the number one station is therefore that station with the *fewest* 60 minute segments with 12 or more commercial minutes.

We considered and rejected using a method of ranking based on the number of 60 minute segments with 12 or more minutes of commercials expressed as a percentage of the total number of 60 minute segments in the station's broadcast week, because a clear advantage would then accrue to stations operating between 12 midnight and 6:00 am, when far fewer commercials can be sold. The result would have been an unrealistic lower overall percentage. By using raw data the focus is on the time of greatest audience viewing, and a more accurate reflection of significant overcommercialization should thus be obtained.

We also considered more heavily weighting the over-16 category as a penalty, since *per se* violations were obvious here. A random sampling of the stations indicated, however, that this category produced

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[18] *Statement of Policy Concerning Loud Commercials*, FCC 65–618 (July 12, 1965).

such a small occurrence relative to those in the over 12 to 16 category (just one or two 60 minute segments per station) that unless an extremely high weighting factor (*e.g.*, 5x) was applied there would be no significance to the overall ranking. Moreover, any weighting would necessarily be arbitrary. Where ties occurred, however, in the commercialization ranking, the number of segments of over-16 minutes of commercials was used to break them.

We recognize that this analysis—and the data upon which it is based—is less than ideal. For a broadcaster to run 13 minutes of non-program matter during 60 minutes when the NAB Code would permit 16 is one thing; to run 13 minutes when the Code permits 9½ is something else again. And yet the renewal form does not permit such distinctions. On the other hand, to the viewer who *is* watching, 13 minutes is 13 minutes whatever time of day the commercials may be run.

Another factor we could not analyze from the available data was whether a broadcaster *could have* sold more commercials than he did. For example, of the 20 highest ranked stations on the commercialization index (that is, the 20 with the fewest number of commercials) 14 are in markets 26 to 50. It is possible to conclude that this "favorable" ranking reflects no higher ethical values, or desire to serve the public interest, but merely the inability to sell more commercials than that.

*Network Affiliates Ranked by Number of Composite Week Hours With More Than 12 Min of Commercials*

| Rank | Call letters | Net. aff. | Mkt. No. | Location | 12-16 min. | Over 16 | Total |
|---|---|---|---|---|---|---|---|
| 1 | KPIX | CBS | 8 | San Francisco | 2 | 0 | 2 |
| 2 | WFMY | CBS | 48 | Gnsb-High Pt-Win Sal | 4 | 0 | 4 |
| 3 | WPRI | CBS | 34 | Providence | 10 | 1 | 11 |
| 4 | WJZ | ABC | 19 | Baltimore | 13 | 0 | 13 |
| 5 | WTIC | CBS | 22 | Hartford-New Haven | 15 | 0 | 15 |
| 6 | KING | NBC | 16 | Seattle-Tacoma | 18 | 0 | 18 |
| 6 | WDHO | ABC | 45 | Toledo | 18 | 0 | 18 |
| 8 | WNYS | ABC | 43 | Syracuse | 19 | 0 | 19 |
| 9 | WAST | ABC | 37 | Albany-Schenectady-T | 18 | 1 | 19 |
| 10 | WTAE | ABC | 9 | Pittsburgh | 20 | 0 | 20 |
| 11 | WLKY | ABC | 36 | Louisville | 21 | 1 | 22 |
| 12 | WLOS | ABC | 40 | Gnville-Sptnbg-Ashvi | 23 | 0 | 23 |
| 13 | WSYR | NBC | 43 | Syracuse | 24 | 0 | 24 |
| 13 | WFBC | NBC | 40 | Gnville-Spinbg-Ashvi | 24 | 0 | 24 |
| 13 | KMSP | ABC | 13 | Minneapolis-St Paul | 24 | 0 | 24 |
| 16 | KCPX | ABC | 50 | Salt Lake City | 25 | 0 | 25 |
| 16 | WSOC | NBC | 35 | Charlotte | 25 | 0 | 25 |
| 16 | WHTN | ABC | 33 | Charleston-Huntingto | 25 | 0 | 25 |
| 16 | KDVR | ABC | 27 | Sacramento-Stockton | 25 | 0 | 25 |
| 16 | WKBW | ABC | 25 | Buffalo | 25 | 0 | 25 |
| 16 | WITI | ABC | 21 | Milwaukee | 25 | 0 | 25 |
| 22 | WAPI | NBC | 38 | Birmingham | 24 | 1 | 25 |
| 23 | KYW | NBC | 4 | Philadelphia | 26 | 0 | 26 |
| 24 | KATU | ABC | 26 | Portland | 27 | 0 | 27 |
| 24 | KTVI | ABC | 12 | St. Louis | 27 | 0 | 27 |
| 26 | WNAC | ABC | 6 | Boston | 26 | 1 | 27 |
| 27 | WCHS | CBS | 33 | Charleston-Huntingto | 24 | 3 | 27 |
| 28 | KSAT | ABC | 45 | San Antonio | 28 | 0 | 28 |
| 28 | WXII | NBC | 48 | Gnsb-High Pt-WinSal | 28 | 0 | 28 |
| 30 | KDKA | CBS | 9 | Pittsburgh | 29 | 0 | 29 |
| 31 | WSIX | ABC | 30 | Nashville | 28 | 1 | 29 |
| 32 | WOAI | NBC | 45 | San Antonio | 27 | 2 | 29 |
| 33 | WKRC | ABC | 20 | Cincinnati | 30 | 0 | 30 |
| 33 | WTVJ | CBS | 18 | Miami | 30 | 0 | 30 |
| 35 | WHAS | CBS | 36 | Louisville | 29 | 1 | 30 |
| 36 | WAVY | NBC | 44 | Norfolk-Newport News-Hampton | 31 | 0 | 31 |
| 36 | WRGB | NBC | 37 | Albany-Schenectady-Troy | 31 | 0 | 31 |
| 36 | WRTV | NBC | 14 | Indianapolis | 31 | 0 | 31 |

*Network affiliates ranked by number of composite week hours with more than 12 min of commercials*—Continued

| Rank | Call letters | Net. aff. | Mkt. No. | Location | 12-16 min. | Over 16 | Total |
|---|---|---|---|---|---|---|---|
| 39 | WBAP | NBC | 11 | Dallas-Fort Worth | 30 | 1 | 31 |
| 40 | WKY | NBC | 41 | Oklahoma City | 29 | 2 | 31 |
| 41 | WSPD | NBC | 45 | Toledo | 32 | 0 | 32 |
| 41 | WVEC | ABC | 44 | Norfolk-Newport News-Hampton | 32 | 0 | 32 |
| 41 | WGR | NBC | 25 | Buffalo | 32 | 0 | 32 |
| 41 | WMAL | ABC | 10 | Washington, D.C | 32 | 0 | 32 |
| 41 | WIEV | ABC | 34 | Providence | 32 | 0 | 32 |
| 46 | WZZM | ABC | 41 | Kalamazoo-Grand Rapids | 31 | 1 | 32 |
| 46 | WVUE | ABC | 31 | New Orleans | 31 | 1 | 32 |
| 46 | WCKT | NBC | 18 | Miami | 31 | 1 | 32 |
| 49 | KTVK | ABC | 45 | Phoenix | 33 | 0 | 33 |
| 49 | WHDQ | ABC | 29 | Memphis | 33 | 0 | 33 |
| 49 | KGW | NBC | 26 | Portland | 33 | 0 | 33 |
| 49 | WSB | NBC | 17 | Atlanta | 33 | 0 | 33 |
| 49 | WBZ | NBC | 6 | Boston | 33 | 0 | 33 |
| 49 | WABC | ABC | 1 | New York City | 33 | 0 | 33 |
| 55 | WBMG | CBS | 38 | Birmingham | 31 | 2 | 33 |
| 56 | WBRC | ABC | 38 | Birmingham | 29 | 4 | 33 |
| 57 | WTNH | ABC | 22 | Hartford-New Haven | 35 | 0 | 35 |
| 57 | WREC | CBS | 29 | Memphis | 35 | 0 | 35 |
| 57 | WBEN | CBS | 25 | Buffalo | 35 | 0 | 35 |
| 57 | KOMO | ABC | 16 | Seattle-Tacoma | 35 | 0 | 35 |
| 57 | KSTP | NBC | 13 | Minneapolis-St. Paul | 35 | 0 | 35 |
| 62 | KOIN | CBS | 26 | Portland | 33 | 2 | 35 |
| 63 | KUTV | NBC | 50 | Salt Lake City | 36 | 0 | 36 |
| 63 | WHNB | NBC | 22 | Hartford-New Haven | 36 | 0 | 36 |
| 63 | WIDL | CBS | 45 | Toledo | 36 | 0 | 36 |
| 63 | KTAR | NBC | 45 | Phoenix | 36 | 0 | 36 |
| 63 | WSM | NBC | 30 | Nashville | 36 | 0 | 36 |
| 63 | KTRK | ABC | 15 | Houston | 36 | 0 | 36 |
| 69 | WTVN | ABC | 28 | Columbus | 36 | 1 | 36 |
| 70 | WJAR | NBC | 34 | Providence | 37 | 0 | 37 |
| 70 | WSAZ | NBC | 33 | Charleston-Huntington | 37 | 0 | 37 |
| 70 | WWL | CBS | 31 | New Orleans | 37 | 0 | 37 |
| 70 | WTEN | CBS | 37 | Albany-Schenectady-T | 37 | 0 | 37 |
| 70 | KWTV | CBS | 41 | Oklahoma City | 37 | 0 | 37 |
| 75 | KSD | NBC | 12 | St. Louis | 36 | 1 | 37 |
| 75 | WFAA | ABC | 11 | Dallas-Fort Worth | 36 | 1 | 37 |
| 77 | KCRA | NBC | 27 | Sacramento-Stockton | 35 | 2 | 37 |
| 78 | WMAR | CBS | 19 | Baltimore | 38 | 0 | 38 |
| 78 | WISH | CBS | 14 | Indianapolis | 38 | 0 | 38 |
| 80 | KPRC | NBC | 15 | Houston | 36 | 2 | 38 |
| 81 | KOCO | ABC | 41 | Oklahoma City | 39 | 0 | 39 |
| 81 | WDSO | NBC | 31 | New Orleans | 39 | 0 | 39 |
| 81 | KENS | CBS | 45 | San Antonio | 39 | 0 | 39 |
| 81 | WCCB | ABC | 35 | Charlotte | 39 | 0 | 39 |
| 81 | WBNS | CBS | 28 | Columbus | 39 | 0 | 39 |
| 86 | WPLG | ABC | 18 | Miami | 38 | 1 | 39 |
| 87 | WLCY | ABC | 24 | Tampa-St. Petersburg | 37 | 2 | 39 |
| 88 | KSL | CBS | 50 | Salt Lake City | 40 | 0 | 40 |
| 88 | KGTV | NBC | 49 | San Diego | 40 | 0 | 40 |
| 88 | WHEN | CBS | 43 | Syracuse | 40 | 0 | 40 |
| 88 | WKZO | CBS | 41 | Kalamazoo-Gr Rapids | 40 | 0 | 40 |
| 88 | WAVE | NBC | 36 | Louisville | 40 | 0 | 40 |
| 88 | WBTV | CBS | 35 | Charlotte | 40 | 0 | 40 |
| 88 | KMBC | ABC | 23 | Kansas City | 40 | 0 | 40 |
| 88 | WBAL | NBC | 19 | Baltimore | 40 | 0 | 40 |
| 88 | WNBC | NBC | 1 | New York City | 40 | 0 | 40 |
| 97 | KABC | ABC | 2 | Los Angeles | 39 | 1 | 40 |
| 98 | WEWS | ABC | 7 | Cleveland | 41 | 0 | 41 |
| 99 | WCPO | CBS | 20 | Cincinnati | 40 | 1 | 41 |
| 99 | KGO | ABC | 8 | San Francisco | 40 | 1 | 41 |
| 101 | KCMO | CBS | 23 | Kansas City | 42 | 0 | 42 |
| 101 | WRC | NBC | 10 | Washington, D.C | 42 | 0 | 42 |
| 101 | WJW | CBS | 7 | Cleveland | 42 | 0 | 42 |
| 101 | KMOX | CBS | 12 | St. Louis | 42 | 0 | 42 |
| 105 | WIIC | NBC | 9 | Pittsburgh | 41 | 1 | 42 |
| 106 | WOTV | NBC | 41 | Kalamazoo-Gr Rapids | 43 | 0 | 43 |
| 106 | WIMJ | NBC | 21 | Milwaukee | 43 | 0 | 43 |
| 108 | KIRO | CBS | 16 | Seattle-Tacoma | 44 | 0 | 44 |
| 108 | WCBS | CBS | 1 | New York City | 44 | 0 | 44 |
| 110 | KHOU | CBS | 15 | Houston | 43 | 1 | 44 |
| 111 | KOA | NBC | 32 | Denver | 42 | 2 | 44 |
| 112 | WQXI | ABC | 17 | Atlanta | 45 | 0 | 45 |
| 113 | WPVI | ABC | 4 | Philadelphia | 44 | 1 | 45 |
| 114 | WMC | NBC | 29 | Memphis | 45 | 1 | 46 |
| 114 | WJBK | CBS | 5 | Detroit | 45 | 1 | 46 |
| 116 | WLAC | CBS | 30 | Nashville | 44 | 2 | 46 |
| 117 | KMGH | CBS | 32 | Denver | 47 | 0 | 47 |

*Network affiliates ranked by number of composite week hours with more than 12 min of commercials*—Continued

| Rank | Call letters | Net. aff. | Mkt. No. | Location | 12-16 min. | Over 16 | Total |
|---|---|---|---|---|---|---|---|
| 117 | WTVT | CBS | 24 | Tampa-St. Petersburg | 47 | 0 | 47 |
| 119 | WSPA | CBS | 40 | Gnville-Sptnbg-Ashvi | 46 | 1 | 47 |
| 119 | WTOP | CBS | 10 | Washington, D.C | 46 | 1 | 47 |
| 121 | WAGA | CBS | 17 | Atlanta | 48 | 0 | 48 |
| 121 | KDFW | CBS | 11 | Dallas-Fort Worth | 48 | 0 | 48 |
| 121 | WKYC | NBC | 7 | Cleveland | 48 | 0 | 48 |
| 121 | WCAU | CBS | 4 | Philadelphia | 48 | 0 | 48 |
| 121 | KNXT | CBS | 2 | Los Angeles | 48 | 0 | 48 |
| 126 | WLWC | NBC | 28 | Columbus | 47 | 1 | 48 |
| 126 | KXTV | CBS | 27 | Sacramento-Stockton | 47 | 1 | 48 |
| 128 | WISN | CBS | 21 | Milwaukee | 46 | 2 | 48 |
| 129 | WWJ | NBC | 5 | Detroit | 49 | 0 | 49 |
| 130 | WLWI | ABC | 14 | Indianapolis | 48 | 1 | 49 |
| 131 | WLWT | NBC | 20 | Cincinnati | 46 | 3 | 49 |
| 132 | WFLA | NBC | 24 | Tampa-St. Petersburg | 50 | 0 | 50 |
| 132 | WXYZ | ABC | 5 | Detroit | 50 | 0 | 50 |
| 132 | WMAQ | NBC | 3 | Chicago | 50 | 0 | 50 |
| 135 | WHIO | CBS | 39 | Dayton | 48 | 2 | 50 |
| 136 | KFMB | CBS | 49 | San Diego | 47 | 3 | 50 |
| 137 | WLWD | NBC | 39 | Dayton | 49 | 2 | 51 |
| 138 | KNBC | NBC | 2 | Los Angeles | 52 | 0 | 52 |
| 139 | WCCO | CBS | 13 | Minneapolis-St. Paul | 51 | 2 | 53 |
| 140 | KOOL | CBS | 45 | Phoenix | 55 | 0 | 55 |
| 141 | WBBM | CBS | 3 | Chicago | 56 | 0 | 56 |
| 142 | KBTV | ABC | 32 | Denver | 57 | 1 | 58 |
| 143 | WLS | ABC | 3 | Chicago | 55 | 3 | 58 |
| 144 | WDAF | NBC | 23 | Kansas City | 49 | 10 | 59 |

## IV. LOCAL PROGRAMMING

From the beginning, a strong legal and cultural emphasis in American broadcasting has been on local service. The Federal Communications Act of 1934, for example, provides that broadcast licenses should be divided "among the several states and communities as to provide a fair, efficient, and equitable distribution of radio services to each of the same." [19] The Act never mentions networks, except to emphasize that the FCC should watch over their operation,[20] and in repeated decisions and rulings since then, both the courts and the FCC have defined television in America as *local* television.[21]

It didn't have to be this way, and in retrospect it would have been more efficient and more profitable for television service to have been national or regional in nature, with superpower stations blanketing the country and "local" service limited only to translating or augmenting the central station's signal. This scheme is used in most of the civilized nations of the world, and indeed, was seriously considered in the United States in what was called DuMont Plan, which the Commission finally rejected in its Sixth Report and Order on Television Allocations in 1952.[22] It said:

> This Commission . . . believes that on the basis of the Communications Act it must recognize the importance of making it possible . . . for a large number of communities to obtain television assignments of their own. In the Commission's view as many communities as possible *should have the opportunity of enjoying the advantages that derive from having local outlets that will be responsive to local needs.* [emphasis added] [23]

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[19] 47 U.S.C. § 307(b).

[20] 47 U.S.C. § 303(i) gives the Commission authority to "make special regulations applicable to radio stations engaged in chain broadcasting."

[21] There was a considerable amount of language to that effect in *National Broadcasting Co. v. United States,* 319 U.S. (1943), which upheld the right of the Commission to regulate the practices of the networks.

[22] Dockets 8736, 8975, 8976 and 9175, 1 P & F Radio Reg. 91:599 (part 3) (1952).

[23] *Id.,* at paragraph 79.

This allocation decision was by no means a minor one, either, since it required a far greater chunk of the valuable, limited frequency space than any system of national or regional broadcasting would have required. As the Commission reiterated in the course of its 1960 *en banc* Programming Inquiry, it had long since determined that "the *principal ingredient* of the licensee's obligation to operate his station in the public interest is the diligent, positive and continuing effort by the licensee to *discover and fulfill the tastes*, needs and desires of his community. . . ."[24]

Despite this conscious attempt to emphasize local service concerned with local politics, education, sports, entertainment, religion, and so forth, for network affiliates the concept has largely been a failure. The statistical analysis of the local programming of the stations in this study indicates that the average station did little more than 13 hours of local programming in a week—13 hours out of a broadcast week that sometimes stretches to 135 hours and beyond. And with most stations, fewer than one-fourth of all "local" hours were programmed in prime time. The rest of the broadcast week is left to be filled by the network feeding often as much as 17 continuous hours a day with *national* entertainment, news, and sports. Moreover, any gap is often taken up by syndicated programs purchased independently by the local stations—programs like The Mike Douglas Show or The Dating Game, or old movies.

The networks simply dominate "local" television. Most viewers know their local television stations by channel number, but few identify those channels with *local stations*. The identification tends to be with the network. Without the occasional station "I.D." required by the FCC, the local stations could very well slip into total anonymity.

*Variety's* Les Brown blames the profit-motive:

> It was a noble theory to make the station the basic component of the system and hold it responsible for what it broadcasts, but in practice it has been about as effective as holding the newsstand dealer responsible for what appears in the papers. Like the newstand operator, all the average station owners really want to do is sell.[25]

It is simply cheaper—and, therefore, better business—to let the network provide the programming. For each network program that the local station carries it receives a small percentage of the network's advertising revenue from that program in return. In addition, the network leaves open a number of commercial "spots" within and around the program that the local station can sell. During prime time hours, and for sports events, those benefits can generate a tremendous amount of revenue for the local station—certainly far more than producing and selling a local program. Instead of creating a local program, paying people to produce it and perform in it, and then worrying about selling it to an advertiser, a local station merely carries its network's programming or acquires nationally syndicated programs.

Moreover, an advertiser, whether his product is sold locally or nationally, is far more likely to buy time on a network or syndicated program than on a local program. With "All in the Family," for example, an advertiser knows he has a successful program, he knows how many people he will be reaching, how old they are, and whether they are male or female. With a local program, he seldom can have that information at all, let alone in advance. It's the difference between the favorite and a long-shot in a horse race. Every one of these factors helps explain why there is so little local programming, and even less high quality local programming.

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[24] *Report and Statement of Policy Re: Commission En Banc Programming Inquiry*, 25 F.R. 7291, 20 P & F Radio Reg. 1901 (1960).

[25] Les Brown, *Television: The Business Behind the Box*, 179 Harcourt Brace Jovanovich, Inc. (1971).

Ranking television stations on the basis of their local programming is particularly difficult. The FCC license renewal form sets out a lengthy definition of a "local program":

> . . . any program originated or produced by the station, or for the production of which the station is primarily responsible and employing live talent for more than 50% of the time. Such a program, taped or recorded for later broadcast, shall be classified as local. A local program fed to a network shall be classified by the originating station as local. All non-network news programs may be classified as local. Programs primarily featuring records or transcriptions shall be classified as recorded even though a station announcer appears in connection with such material. However, identifiable units of such programs which are live and separately logged as such may be classified as local.[26]

It is a flexible, confusing definition that different stations interpret differently, but it leaves no doubt as to the importance of local programming. In addition to this definition, the Policy Statement attached to the renewal form identifies 14 major elements as "necessary or desirable to serve the broadcast needs of many communities."[27] Local programming is necessarily an important part of at least seven of those elements, although only three—news, public affairs, and local programming—are singled out for special attention on the license renewal form.[28]

In ranking the stations based on their local programming the raw total of hours is used rather than the expression of that total as a percentage of the composite week, for the reasons given in this section on news.[29] Two factors from the renewal application are combined to give a total "index" of the licensee's local programming performance. The total hours of local programming and the total hours of local programming in prime time are added to one another and that total divided by two. The stations are then ranked on the basis of that index. Thus, we have given additional significance to the *prime time* local programming factor. Prime time local programming is, in effect, being counted twice—once by itself and once as part of the *total* hours of local programming. This additional weight reflects a conscious judgment on our part that the impact of television should be measured in terms of the number of people it reaches, which number is far greater in prime time than any other time during the broadcast week. For a network affiliate to *program locally* in prime time, other than during the half hour "returned" under the prime time access rule,[30] requires a greater degree of commitment to the local viewing public as well as to the local advertiser. While counting the prime time local twice may be arbitrary, in view of the considerably greater number of viewers during prime time, we feel it is a legitimate and conservative additional weighting.[31]

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[26] F.C.C. Form No. 303, Section 4. b, page 1.

[27] Id.

[28] See Part I of this Chapter.

[29] See text at page 27 of this Chapter. "Total hours of local programming," for purposes of this report was limited to local programming logged between the hours of 8:00 a.m. and 11:00 p.m. While we would have preferred to have information limited to the hours between 8:00 a.m. and 12:00 p.m. (to account for the half hour of local news broadcast by most network affiliates between the hours of 11:00 p.m. and 11:30 p.m.), we felt it was more important to discourage stations from seeking to improve their "rating" by dumping addtional local programming into the virtually viewerless hours of the early morning. As additional justification for ignoring that "traditional" half hour of local news, we would note:

i) this particular programming is generally the same for every network affiliate in the top 50 markets; and

ii) It will have already been accounted for under the category "news, public affairs and other."

The over-all results of the survey of local programming are not encouraging. With but few exceptions, local network affiliates pay little attention to local programming and even less attention to local programming in prime time. And the Commission, rather than set standards for further scrutiny in this area it has supposedly considered so important for so long, continues to look the other way at renewal time.

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[30] 47 CFR § 658(k).

[31] One problem encountered in this analysis was the precise definition of "prime time." In some central and mountain time zone states, for example, prime time actually runs from 5:00 PM to 10:00 PM instead of 6:00 PM to 11:00 PM. While the recently adopted license renewal form specifically takes that phenomenon into effect, all the data we have gathered has been subject to the interpretation of "prime time" by the licensee. It has not appeared to have a major effect on the analysis, but should be borne in mind especially when considering the local programming segment of this report.

*Network affiliates ranked by local programming*

| Rank | Call letters | Net. aff. | Mkt. No. | Location | Prime time local and rank | | Local programming and rank | | Composite |
|---|---|---|---|---|---|---|---|---|---|
| 1 | WLWT | NBC | 20 | Cincinnati | 6.17 | 42 | 35.67 | 1 | 20.917 |
| 2 | KYW | NBC | 4 | Philadelphia | 6.00 | 46 | 25.42 | 2 | 15.708 |
| 3 | KNBC | NBC | 2 | Los Angeles | 8.00 | 7 | 21.92 | 4 | 14.958 |
| 4 | KDKA | CBS | 9 | Pittsburgh | 8.82 | 5 | 19.88 | 8 | 14.350 |
| 5 | WSB | NBC | 17 | Atlanta | 9.00 | 2 | 19.42 | 11 | 14.208 |
| 6 | WJZ | ABC | 19 | Baltimore | 8.53 | 6 | 19.45 | 10 | 13.992 |
| 7 | WWL | CBS | 31 | New Orleans | 9.58 | 1 | 17.92 | 21 | 13.750 |
| 8 | KTAR | NBC | 45 | Phoenix | 8.00 | 7 | 18.92 | 15 | 13.458 |
| 9 | WWJ | NBC | 5 | Detroit | 6.52 | 27 | 20.30 | 6 | 13.408 |
| 10 | WPLG | ABC | 18 | Miami | 4.53 | 76 | 22.02 | 3 | 13.275 |
| 11 | WMAR | CBS | 19 | Baltimore | 7.42 | 16 | 19.03 | 14 | 13.225 |
| 12 | WCCO | CBS | 13 | Minneapolis-St. Paul | 8.92 | 4 | 17.25 | 32 | 13.083 |
| 13 | WTMJ | NBC | 21 | Milwaukee | 8.00 | 7 | 17.95 | 20 | 12.975 |
| 14 | WPVI | ABC | 4 | Philadelphia | 4.00 | 80 | 21.92 | 4 | 12.958 |
| 15 | WBZ | NBC | 6 | Boston | 6.50 | 29 | 19.35 | 12 | 12.925 |
| 16 | WKY | NBC | 41 | Oklahoma City | 6.20 | 41 | 19.32 | 13 | 12.758 |
| 17 | WIIC | NBC | 9 | Pittsburgh | 6.50 | 29 | 18.83 | 16 | 12.667 |
| 18 | KTRK | ABC | 15 | Houston | 7.38 | 18 | 17.90 | 22 | 12.642 |
| 19 | WBAL | NBC | 19 | Baltimore | 7.80 | 10 | 17.30 | 31 | 12.550 |
| 20 | WDSU | NBC | 31 | New Orleans | 7.50 | 15 | 17.58 | 27 | 12.542 |
| 21 | KNXT | CBS | 2 | Los Angeles | 6.50 | 29 | 18.55 | 17 | 12.525 |
| 22 | WBNS | CBS | 28 | Columbus | 6.67 | 25 | 18.33 | 18 | 12.500 |
| 23 | WBRC | ABC | 38 | Birmingham | 5.23 | 65 | 19.62 | 9 | 12.425 |
| 24 | WSM | NBC | 30 | Nashville | 7.02 | 20 | 17.60 | 26 | 12.308 |
| 25 | KHOU | CBS | 15 | Houston | 6.03 | 44 | 18.25 | 19 | 12.142 |
| 26 | KDFW | CBS | 11 | Dallas-Fort Worth | 7.67 | 12 | 16.17 | 39 | 11.917 |
| 27 | KCRA | NBC | 27 | Sacramento-Stockton | 7.40 | 17 | 16.27 | 38 | 11.833 |
| 28 | WMAL | ABC | 10 | Washington D.C. | 3.50 | 91 | 20.07 | 7 | 11.783 |
| 29 | KPRC | NBC | 15 | Houston | 7.52 | 14 | 15.93 | 42 | 11.725 |
| 30 | WLWD | NBC | 39 | Dayton | 5.50 | 57 | 17.83 | 23 | 11.667 |
| 31 | KPIX | CBS | 8 | San Francisco | 7.00 | 21 | 16.00 | 40 | 11.500 |
| 32 | KOMO | ABC | 16 | Seattle-Tacoma | 6.00 | 46 | 16.98 | 33 | 11.492 |
| 33 | WBBM | CBS | 3 | Chicago | 7.73 | 11 | 15.23 | 53 | 11.483 |
| 34 | WDAF | NBC | 23 | Kansas City | 6.50 | 29 | 16.45 | 36 | 11.475 |
| 35 | WHAS | CBS | 36 | Louisville | 5.57 | 56 | 17.35 | 30 | 11.458 |
| 36 | KSD | NBC | 12 | St. Louis | 6.50 | 29 | 16.33 | 37 | 11.417 |
| 37 | WNAC | ABC | 6 | Boston | 5.00 | 70 | 17.58 | 27 | 11.292 |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| 38 | WMC | NBC | 29 | Memphis | 7.00 | 21 | 15.47 | 48 | 11.233 |
| 39 | WLAC | CBS | 30 | Nashville | 6.92 | 23 | 15.00 | 55 | 10.958 |
| 40 | WCPO | CBS | 20 | Cincinnati | 4.00 | 80 | 17.75 | 25 | 10.875 |
| 41 | WMAQ | NBC | 3 | Chicago | 4.15 | 78 | 17.57 | 29 | 10.858 |
| 42 | WCAU | CBS | 4 | Philadelphia | 6.00 | 46 | 15.58 | 44 | 10.792 |
| 43 | KSTP | NBC | 13 | Minneapolis-St. Paul | 6.52 | 27 | 15.00 | 55 | 10.758 |
| 44 | KMGH | CBS | 32 | Denver | 6.27 | 38 | 15.07 | 54 | 10.667 |
| 45 | WHIO | CBS | 39 | Dayton | 6.00 | 46 | 15.30 | 51 | 10.650 |
| 46 | WBTV | CBS | 35 | Charlotte | 5.70 | 55 | 15.53 | 46 | 10.617 |
| 47 | WFAA | ABC | 11 | Dallas-Fort Worth | 9.00 | 2 | 12.00 | 79 | 10.500 |
| 48 | WDTV | NBC | 41 | Kalamazoo-Gr Rapids | 5.00 | 70 | 15.93 | 42 | 10.467 |
| 49 | WRC | NBC | 10 | Washington D.C | 6.00 | 46 | 14.92 | 58 | 10.458 |
| 49 | KATU | ABC | 26 | Portland | 4.97 | 73 | 15.95 | 41 | 10.458 |
| 51 | KFMB | CBS | 49 | San Diego | 5.00 | 70 | 15.50 | 47 | 10.250 |
| 52 | WTAE | ABC | 9 | Pittsburgh | 3.42 | 101 | 16.78 | 34 | 10.100 |
| 53 | WLS | ABC | 3 | Chicago | 7.03 | 19 | 13.10 | 74 | 10.067 |
| 54 | KCMO | CBS | 23 | Kansas City | 7.58 | 13 | 12.50 | 76 | 10.042 |
| 54 | WBEN | CBS | 25 | Buffalo | 3.50 | 91 | 16.58 | 35 | 10.042 |
| 54 | KOA | NBC | 32 | Denver | 4.67 | 75 | 15.42 | 49 | 10.042 |
| 57 | KSL | CBS | 50 | Salt Lake City | 6.13 | 43 | 13.88 | 64 | 10.008 |
| 58 | WOAI | NBC | 45 | San Antonio | 6.00 | 46 | 13.92 | 62 | 9.958 |
| 59 | KMOX | CBS | 12 | St. Louis | 6.27 | 38 | 13.48 | 68 | 9.875 |
| 60 | WNBC | NBC | 1 | New York City | 6.00 | 46 | 13.67 | 66 | 9.833 |
| 60 | WLCY | ABC | 24 | Tampa-St. Petersburg | 1.83 | 127 | 17.83 | 23 | 9.833 |
| 62 | KOCO | ABC | 41 | Oklahoma City | 3.75 | 87 | 15.57 | 45 | 9.658 |
| 63 | WABC | ABC | 1 | New York City | 5.38 | 64 | 13.62 | 67 | 9.500 |
| 64 | WLWI | ABC | 14 | Indianapolis | 5.17 | 68 | 13.75 | 65 | 9.458 |
| 64 | WRTV | NBC | 14 | Indianapolis | 5.50 | 57 | 13.42 | 71 | 9.458 |
| 66 | KIRO | CBS | 16 | Seattle-Tacoma | 3.83 | 85 | 14.92 | 58 | 9.375 |
| 67 | KGW | NBC | 26 | Portland | 3.00 | 108 | 15.42 | 49 | 9.208 |
| 68 | WTIC | CBS | 22 | Hartford-New Haven | 5.10 | 69 | 13.20 | 73 | 9.150 |
| 69 | WJW | CBS | 7 | Cleveland | 2.95 | 117 | 15.28 | 52 | 9.117 |
| 70 | WAGA | CBS | 17 | Atlanta | 6.55 | 26 | 11.67 | 83 | 9.108 |
| 71 | WCKT | NBC | 18 | Miami | 5.50 | 57 | 12.42 | 77 | 8.958 |
| 71 | WITI | ABC | 21 | Milwaukee | 6.50 | 29 | 11.42 | 84 | 8.958 |
| 73 | WISH | CBS | 14 | Indianapolis | 6.00 | 46 | 11.82 | 81 | 8.908 |
| 74 | WKRC | ABC | 20 | Cincinnati | 2.77 | 119 | 14.95 | 57 | 8.858 |
| 75 | WCBS | CBS | 1 | New York City | 6.50 | 29 | 11.00 | 88 | 8.750 |
| 76 | KING | NBC | 16 | Seattle-Tacoma | 3.45 | 100 | 14.05 | 61 | 8.750 |
| 77 | KWTV | CBS | 41 | Oklahoma City | 6.75 | 24 | 10.72 | 92 | 8.733 |
| 78 | WKBW | ABC | 25 | Buffalo | 3.50 | 91 | 13.92 | 62 | 8.708 |
| 79 | WTOP | CBS | 10 | Washington D.C | 6.28 | 37 | 11.10 | 86 | 8.692 |
| 80 | WTVT | CBS | 24 | Tampa-St. Peterburg | 6.25 | 40 | 10.80 | 90 | 8.525 |
| 81 | WTNH | ABC | 22 | Hartford-New Haven | 3.03 | 107 | 13.48 | 68 | 8.258 |

*Network affiliates ranked by local programming*—Continued

| Rank | Call letters | Net. aff. | Mkt. No. | Location | Prime time local and rank | | Local programming and rank | | Composite |
|---|---|---|---|---|---|---|---|---|---|
| 82 | WSIX | ABC | 30 | Nashville | 4. 52 | 77 | 11. 82 | 82 | 8. 167 |
| 83 | KUTV | NBC | 50 | Salt Lake City | 6. 02 | 45 | 10. 17 | 100 | 8. 092 |
| 84 | KOIN | CBS | 26 | Portland | 3. 90 | 84 | 12. 13 | 78 | 8. 015 |
| 85 | WCHS | CBS | 33 | Charleston-Huntington | 2. 50 | 122 | 13. 47 | 70 | 7. 800 |
| 86 | KTVI | ABC | 12 | St. Louis | 2. 50 | 122 | 13. 25 | 72 | 7. 877 |
| 87 | WTOL | CBS | 45 | Toledo | 5. 50 | 57 | 10. 18 | 99 | 7. 842 |
| 88 | KTVK | ABC | 45 | Phoenix | 2. 80 | 118 | 12. 80 | 75 | 7. 800 |
| 89 | WXYZ | ABC | 5 | Detroit | 5. 50 | 57 | 10. 00 | 104 | 7. 750 |
| 89 | KSAT | ABC | 45 | San Antonio | 6. 50 | 29 | 9. 00 | 115 | 7. 750 |
| 91 | KBTV | ABC | 32 | Denver | 5. 22 | 67 | 10. 17 | 100 | 7. 692 |
| 92 | WEWS | ABC | 7 | Cleveland | 0. 50 | 134 | 14. 65 | 60 | 7. 575 |
| 93 | WJBK | CBS | 5 | Detroit | 4. 00 | 80 | 10. 83 | 89 | 7. 417 |
| 94 | KGO | ABC | 8 | San Francisco | 3. 58 | 89 | 11. 08 | 87 | 7. 333 |
| 95 | WAVE | NBC | 36 | Louisville | 3. 00 | 108 | 11. 42 | 84 | 7. 208 |
| 95 | WFMY | CBS | 48 | Gnsb-High Pt-Win Sal | 4. 00 | 80 | 10. 42 | 95 | 7. 208 |
| 97 | WISN | CBS | 21 | Milwaukee | 4. 77 | 74 | 9. 55 | 108 | 7. 158 |
| 97 | KOOL | CBS | 45 | Phoenix | 5. 50 | 57 | 8. 82 | 118 | 7. 158 |
| 99 | WLWC | NBC | 28 | Columbus | 3. 25 | 104 | 10. 67 | 93 | 6. 958 |
| 99 | WRGB | NBC | 37 | Albany-Schenectady-T | 3. 50 | 91 | 10. 42 | 95 | 6. 958 |
| 101 | KXTV | CBS | 27 | Sacramento-Stockton | 5. 50 | 57 | 8. 33 | 124 | 6. 917 |
| 102 | KMBC | ABC | 23 | Kansas City | 6. 00 | 46 | 7. 58 | 136 | 6. 792 |
| 103 | WSPA | CBS | 40 | Gnville-Sptnbg-Ashvi | 3. 30 | 103 | 10. 25 | 98 | 6. 775 |
| 104 | WFBC | NBC | 40 | Gnville-Sptnbg-Ashvi | 3. 00 | 108 | 10. 42 | 95 | 6. 708 |
| 105 | WTVJ | CBS | 18 | Miami | 4. 02 | 79 | 9. 38 | 112 | 6. 700 |
| 106 | KENS | CBS | 45 | San Antonio | 3. 68 | 88 | 9. 53 | 109 | 6. 608 |
| 107 | WVUE | ABC | 31 | New Orleans | 5. 23 | 65 | 7. 93 | 128 | 6. 583 |
| 108 | WKZO | CBS | 41 | Kalamazoo-Gr Rapids | 3. 00 | 108 | 10. 08 | 103 | 6. 542 |
| 109 | KMSP | ABC | 13 | Minneapolis-St Paul | 3. 08 | 106 | 9. 95 | 107 | 6. 517 |
| 110 | WTEN | CBS | 37 | Albany-Schenectady-T | 3. 00 | 108 | 10. 00 | 104 | 6. 500 |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| 111 | KGTV | NBC | 49 | San Diego | 3.50 | 91 | 9.42 | 111 | 6.458 |
| 112 | WZZM | ABC | 41 | Kalamazoo-Gr Rapids | 0.75 | 133 | 12.00 | 79 | 6.375 |
| 113 | WKYC | NBC | 7 | Cleveland | 3.55 | 90 | 9.12 | 114 | 6.333 |
| 114 | WJAR | NBC | 34 | Providence | 3.50 | 91 | 8.83 | 117 | 6.167 |
| 115 | WPRI | CBS | 34 | Providence | 3.50 | 91 | 8.67 | 121 | 6.083 |
| 116 | WHNB | NBC | 22 | Hartford-New Haven | 3.33 | 102 | 8.77 | 119 | 6.050 |
| 117 | WSYR | NBC | 43 | Syracuse | 2.50 | 122 | 9.50 | 110 | 6.000 |
| 118 | WXII | NBC | 48 | Gnsb-High Pt-Win Sal | 3.00 | 108 | 8.92 | 116 | 5.958 |
| 119 | WSAZ | NBC | 33 | Charleston-Huntington | 3.83 | 85 | 7.67 | 135 | 5.750 |
| 120 | WFLA | NBC | 24 | Tampa-St. Petersburg | 3.00 | 108 | 8.42 | 123 | 5.708 |
| 120 | WAVY | NBC | 44 | Norf-Newp News-Hamp | 3.50 | 91 | 7.92 | 129 | 5.708 |
| 122 | WSDC | NBC | 35 | Charlotte | 3.00 | 108 | 8.33 | 124 | 5.667 |
| 123 | KABC | ABC | 2 | Los Angeles | 1.00 | 130 | 10.17 | 100 | 5.583 |
| 123 | WSPD | NBC | 45 | Toledo | 3.00 | 108 | 8.17 | 127 | 5.583 |
| 125 | WBMG | CBS | 38 | Birmingham | 3.20 | 105 | 7.83 | 131 | 5.517 |
| 126 | WAPI | NBC | 38 | Birmingham | 2.50 | 122 | 8.50 | 122 | 5.500 |
| 127 | WHEN | CBS | 43 | Syracuse | 3.50 | 91 | 7.40 | 137 | 5.450 |
| 128 | WTVN | ABC | 28 | Columbus | 0.0 | 139 | 10.75 | 91 | 5.375 |
| 129 | WQXI | ABC | 17 | Atlanta | 0.0 | 139 | 10.55 | 94 | 5.275 |
| 130 | WTFV | ABC | 34 | Providence | 0.50 | 134 | 10.00 | 104 | 5.250 |
| 131 | WREC | CBS | 29 | Memphis | 2.67 | 120 | 7.75 | 133 | 5.208 |
| 132 | WBAP | NBC | 11 | Dallas-Fort Worth | 1.17 | 129 | 9.17 | 113 | 5.167 |
| 133 | WCCB | ABC | 35 | Charlotte | 0.83 | 131 | 8.33 | 124 | 4.583 |
| 134 | KOVR | ABC | 27 | Sacramento-Stockton | 2.67 | 120 | 6.17 | 141 | 4.417 |
| 135 | WAST | ABC | 37 | Albany-Schenectady-T | 1.48 | 128 | 7.33 | 138 | 4.408 |
| 136 | WLKY | ABC | 36 | Louisville | 0.0 | 139 | 8.75 | 120 | 4.375 |
| 137 | WVEC | ABC | 44 | Norf-Newp News-Hamp | 0.20 | 138 | 7.73 | 131 | 3.967 |
| 138 | WHBQ | ABC | 29 | Memphis | 0.0 | 139 | 7.92 | 129 | 3.958 |
| 139 | WDHO | ABC | 45 | Toledo | 0.0 | 139 | 7.82 | 132 | 3.908 |
| 140 | WHTN | ABC | 33 | Charleston-Huntington | 0.50 | 134 | 7.00 | 139 | 3.750 |
| 141 | WGR | NBC | 25 | Buffalo | 2.50 | 122 | 4.50 | 143 | 3.500 |
| 142 | KCPX | ABC | 50 | Salt Lake City | 0.83 | 131 | 6.10 | 142 | 3.467 |
| 143 | WLOS | ABC | 40 | Gnville-Sptnbg-Ashvi | 0.0 | 139 | 6.53 | 140 | 3.267 |
| 144 | WNYS | ABC | 43 | Syracuse | 0.50 | 134 | 2.92 | 144 | 1.708 |

## V. CONFIDENTIAL FINANCIAL INFORMATION

We believe that financial information is of special relevance in evaluating stations' programming performance. To the extent that "quality" or "local" programming costs more than old movies, a station's gross revenues, profit, and programming expenses are relevant in evaluating whether more should be expected of the station. Thus, it would often be of advantage to poorer stations to make this information public. Financial information is traditionally available for public utilities and other companies regulated by government. Getting financial information from the FCC is, however, another matter.

The Commission originally collected financial information from broadcast licensees as a way of enabling the government to keep up with the growth and development of a relatively new communications industry. It was thought that the data would be of importance to the broadcasters themselves. Even today the Commission accumulates and publishes market-by-market reports of revenues and expenditures for the industry.

Over the years the Commission has gradually expanded its use of this information into more substantive policy areas. Profits are deemed relevant, for example, in determining how much a station should be fined for a violation of Commission rules. It is used to determine whether a market can sustain economically an additional radio or television station. It can be used in change of format cases to support (or challenge) the argument of a licensee that significant losses justify a different programming format.

It is our contention that financial information should also be used in determining whether a licensee has met its obligation to operate in the "public interest, convenience or necessity." Specifically, the amount of money spent on programming, particularly local programming, compared to the station's profits, or gross revenues, can be a valid indicator of its commitment to public service. Our premise is that a station spending a greater percentage of its revenues on local programming is doing a better job, and accordingly we have included a financial factor designed to reflect a licensee's performance as a fourth (and final) input into our overall progamming ranking.

There are, of course, severe limitations upon the effective use of financial information in a report of this nature. Despite the fact that all licensees are required to file financial forms annually, there is no uniform system of accounts; so there is no necessary consistency between licensees' reports. Nor does the Commission do an audit on the information it receives; so there is no guarantee of accuracy. Furthermore, the information currently required is not particularly detailed or specific. For example, it is impossible to tell how much of its total program expenses have been spent by a licensee on locally-originated programming or live-on-air talent, as opposed to extensive libraries of old movies.

Perhaps the most significant obstacle to the analysis of this information, however, is its confidentiality. This has made it exceedingly difficult for the Commission staff to analyze and report our findings in the context of this study. And it makes it virtually impossible for a concerned citizens group accurately to gauge the performance of a licensee.

On March 23, 1938, under the authority of the Communications Act of 1934 [32] and the Rules [33] the Commission ordered that each licensee of a broadcast station [34] file information about its earnings and expenditures.[35] In April, 1945, the Commission, in seeking to update the rules regarding the filing of financial data, also invited comments as to whether any or all of the information required to be filed should be open for public inspection.[36] In August of that year the proposed rules were adopted, including for the first time a very limited public disclosure provision commented upon by Commissioner Clifford Durr as follows:

> . . . the amended rules are a move in the right direction, but in my opinion they stop far short of making available to the public information to which it is properly entitled. Section 1.5 still withholds from public scrutiny balance sheets and income statements of broadcasting licensees filed with the Commission pursuant to Section 1.301 and network and transcription service contracts filed pursuant to Section 1.302. It is true that the Commission . . . announced "that it is giving consideration to expanding its annual statistical report so that the report will contain certain financial data with respect to the operations of individual stations." This, too, gives promise of a further move in the right direction, but I can see no reason for giving the public less than complete information.[37]

In 1960 the Commission staff undertook extensive revision of the annual financial report with the purpose of obtaining more detailed, current data on all stations. A Notice of Proposed Rulemaking was adopted and published in November 1960,[38] and the currently applicable financial Form 324 was adopted in a Memorandum Order and Opinion in January of 1963.[39] The comments received in the course of the proceeding mainly spoke of the additional burdens on the licensees to furnish more complete information. The question of confidentiality was not fully considered. The information collected on April 1 of each year remains "confidential," subject of the provisions of August, 1945, its disclosure permitted only upon a "substantial showing of relevancy and need." [40]

Two provisions of the Public Information Act of 1966 are pertinent to the Commission's authority to disclose or withhold confidential financial information: 5 U.S.C. § 552 provides that the general requirement of each administrative agency to "make available to the public" certain types of information does not apply to ". . . trade secrets and commercial or financial information obtained from a person and privileged or confidential." Notwithstanding this language, § 552 does not *prohibit* the disclosure of such financial information; it merely exempts it from *compulsory* disclosure, leaving the release of financial information to the discretion of the agency. The Commission has explicitly recognized this discretionary authority in the text of its rule,[41] which states that the Commission is "authorized to withhold"—not *prevented* from withholding—such confidential information under Federal law.

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[32] 47 U.S.C. § 308(b).

[33] Then numbered § 1.341 of the Commission rules. Today that authorization may be found at 47 CFR § 1.611.

[34] *Id.* Today the language requires the reports of "each licensee or permittee of a commercially operated standard, FM, television or international broadcast station (as defined in Part 73 of this chapter). . . ."

[35] At that time the forms were 705 and 706 and were labelled "Annual Financial Report for Standard Broadcast Stations and Networks." By 1940, Section 1.341, note 33 supra, was deleted and redesignated Section 1.361. In August 1943, Section 1.361 was revised and forms were thereafter referred to as 324, 328, and 329. Information regarding ownership, operation, interests and contracts was also required by that date.

[36] *In the Matter of Promulgation of Rules and Regs. Concerning the Filing of Financial Ownership and Other Reports of Broadcast Licensees,* Docket 6756, 10 Fed. Reg. 4364 (1945).

[37] Memorandum of Commissioner Clifford Durr, dated August 3, 1945.

[38] 25 Fed. Reg. 10738 (1960).

[39] 28 Fed. Reg. 36 (1963).

[40] See 47 CFR § 0.451, 0.457, 0.461 (1968): *Multivision Northwest, Inc.,* 8 F.C.C. 2d 892, *aff'd on reconsideration,* 10 F.C.C. 2d 391 (1967).

The second pertinent provision of the U.S. Code is contained in 18 U.S.C. § 1905, which provides in part:

> Whoever, being an officer or employee of the United States or any department or agency thereof, publishes, divulges, discloses, or makes known in any manner or to any extent *not authorized by law* any information coming to him in the course of his employment or official duties . . .. which information concerns or relates to . . . the identity, confidential statistical data, amount or source of any income, profits, losses, or expenditures of any person, firm, partnership, corporation, or association; or permits any income return or copy thereof . . . to be seen or examined by any person *except as provided by law;* shall be fined. . . ." [emphasis added]

Once again, Section 1905 does not bar an agency from releasing otherwise confidential financial information. It merely imposes sanctions for the "unauthorized" release of such information—that is, in a manner not approved by the agency in its official capacity. As the Court explained in *Consumers Union of U.S., Inc. v. Veterans Administration*, 425 F. 2d 578 (D.C. Circuit 1970):

> Unlike other statutes which specifically define the range of disclosable information. . ., Section 1905 merely creates a criminal sanction for the release of "confidential information." Since this type of information is already protected from disclosure under the Act by § 552(b)(4), Section 1905 should not be read to expand this exemption, especially because the Act requires that exemptions be narrowly construed, 5 U.S.C. § 552(c) (Supp. IV, 1969).[42]

The scope of Section 1905, therefore, is governed by that of Section 552, which, in turn, leaves disclosure to the discretion of the individual agency. Where the "public interest" is concerned, the Public Information Act and its legislative history has been interpreted to place on the government agency the burden of justifying denials of disclosures:

> This law was initiated by Congress and signed by the President with several key concerns: (a) that disclosure be the general rule, not the exception; (b) that all individuals have equal rights of access; (c) that the burden be on the Government to justify the withholding of a document, not on the person who requests it. . .[43]

The Commission rules contain its principal guidelines on nondisclosure of confidential information:

> The Commission is authorized to withhold from public inspection materials which would be privileged as a matter of law if retained by the person who submitted them and materials which would not customarily be released to the public by that person, whether or not such materials are protected from disclosure by a privilege.[44]

In the same Section, the Commission goes on to include the following material in non-public status: "(i) Financial reports submitted by licensees of broadcast stations pursuant to § 1.611 of this chapter or by radio and television networks.[45]

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[41] 5 U.S.C. § 552(b)(4).

[42] 47 CFR § 0.457(d).

[43] 425 F. 2d 578 (D.C. Circuit 1970).

[44] See *Memorandum of the Attorney General on the Public Information Act*, pp. iii–iv (June 1967); See also *Amendment of Part 0, Rules and Regulations*, 8 F.C.C. 2d 908 (1967).

Although the Commission's rules permit the disclosure of confidential financial information upon a "persuasive showing as to the reasons for inspection of such materials," [46] this "persuasive showing" is difficult for the average citizens group. The Commission's procedures, for example, may require three separate rounds of pleadings: the first to obtain an initial ruling from the Commission's Executive Director; a second to seek review by the full Commission; and a third to obtain judicial review of Commission denials of disclosure.[47] Months can pass before the Commission issues a final ruling suitable for judicial review.[48] Faced with these obstacles, inexperienced petitioners are highly unlikely to prevail even if they are able to follow the prescribed procedures.[49]

There have been three significant recent tests of the right of the Commission to withhold confidential financial information from public groups seeking to use that information to assess the relative performance of broadcast licensees: the *Alianza* case, the *KTTV/Metromedia* Commission proceeding, and the Stern Community Law Firm petition for a change in Commission rules.

In the *Alianza* case,[50] the D.C. Circuit Court of Appeals upheld the refusal of the Commission to disclose the annual financial reports of three Albuquerque, New Mexico, television stations to an organization of Mexican-Americans who claimed the reports would be helpful to it in deciding whether to oppose the stations' license renewals.[51] The Commission decided the release turned upon "the reasonable necessity for petitioners having the information, the position of the station in the proceeding involved, the inability to obtain the requested information from other sources, and the relevancy and materiality of the information sought." [52]

Alianza contended that its request met the Commission's qualifications for disclosure. Before the Commission can review a television broadcast license, the group alleged, it must find that the station's past three-year performance has sufficiently served the "public interest, convenience, and necessity." A critical element in judging past performance under that standard is the past programming. Discussing one critierion in evaluating past programming, Alianza stated: "there no longer seems any question that the adequacy of a station's programming must be judged in substantial part by the extent to which it reinvests an adequate percentage of its profits into locally originated and community-oriented programming." Alianaza maintained further that a broadcaster is a "public trustee," whose profits derive from the use of publicly-owned property. The public, it asserted, is entitled to a "fair return" on their investment in the nature of programming. This "fair return" is the value of the programming benefits received by the public expressed as a function of profits. Consequently the profit figures and programming expenditures contained in FCC forms 324 are necessary to determine the "fair return." [53]

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[45] 47 C.F.R. § 0.457(d)(1) (1969).

[46] *Id.* Indeed, the Commission has exercised its discretion on numerous occasions, releasing otherwise confidential information for "public interest" reasons. *See, e.g., Cape Cod Broadcasting Co., Inc.*, 23 F.C.C. 2d 277 (1970); *Fetzer Cable Vision*, 11 F.C.C. 2d 516 (1968); *MultiVision Northwest, Inc.*, 8 F.C.C. 2d 892 (1967); *aff'd on reconsideration*, 10 F.C.C. 2d 391 (1967); cf. *Sioux Empire Broadcasting Co.*, 10 F.C.C. 2d 132 (1967).

[47] See the procedure outlined in 47 C.F.R. § 0.461, "Requests for inspection of materials not routinely available for inspection."

[48] *See, e.g., Request by Reuben B. Robertson*, 25 F.C.C. 2d 942 (1970) (more than two months taken to resolve a simple inspection request).

[49] *See, e.g., McKeon Construction Co.*, 27 F.C.C. 2d 879 (1971); *KOWL, Inc.*, 24 F.C.C. 2d 305 (1970); cf. *Sioux Empire Broadcasting Co.*, 10 F.C.C. 2d (1967).

[50] *Alianza Federal de Pueblos Libres v. Federal Communications Commission*, 25 P & F Radio Rig. 2d 20001 (D.C. Circuit 1972).

[51] See the Commission's original Alianza decision, 31 F.C.C. 2d 557 (1971). *See also Sioux Empire Broadcasting Co.*, 10 F.C.C. 2d 132, 134 (1967).

[52] *KOWL, Inc.*, 24 F.C.C. 2d 305 (1970). A fuller discussion of the confidential treatment accorded to annual financial reports and of past treatment of similar requests may be found at 24 F.C.C. 2d 306.

The Court of Appeals, in a brief *per curiam* opinion upholding the Commission's contention that Alianza's arguments were not sufficiently substantial to warrant disclosure, merely accepted the Commission's argument that

> the issue of financial disclosure is prematurely before the court . . . because the licensee may be denied renewal for deficient public service programming without reference to financial circumstances, or, in any hearing which the Commission may hold, disclosure may become necessary if the licensee attempts to justify inadequate public service programming by reference to its financial necessities.[54]

"In any event," the court concluded, "if renewal is granted, petitioner may seek review of that action in this court and urge as error the Commission's handling of the financial disclosure question." [55]

The second major recent landmark in the area of financial disclosure was the request by Citizens Communications Center for inspection of the financial reports of Metromedia, Inc., licensee of KTTV–TV, Los Angeles, California,[56] decided just one month after *Alianza.* In *KTTV* the Commission chose to uphold the decision of its Executive Director to allow Citizens Communication Center, on behalf of the National Association for Better Broadcasting and others, to examine the licensee's financial reports for the years 1969, 1970 and 1971. Metromedia, in response to various petitions to deny the renewal of its KTTV license, has asserted that the Commission should examine its programming performance "in the light of its income picture compared to the huge profits of the three network owned stations," and also that "Commission records reflect that . . . the 'large profits' in this market are being made by the network owned stations. The rate of return for Metromedia on capital invested in KTTV has been less than the Commission permits a public utility to make." [57] The Commission felt that these assertions relied sufficiently upon the confidential information contained in the financial reports to require the disclosure of that information to the petitioners to deny.[58]

The *Alianza* and *KTTV* cases epitomize the case-by-case approach the Commission has been taking with regard to disclosure of financial information; in neither case was there any cogent discussion of the value of making *all* financial reports available to the public as Commissioner Durr had suggested in his Memorandum some 28 years ago. In the course of oral argument of the *Alianza* case before the Court of Appeals, however, the FCC *did* go on record with the assertion that *if* all financial information were to be made public, it should be done in a formal rulemaking and not in the course of resolving an individual case.

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[53] As authority for its argument, Alianza cite *Wichita-Hutchinson Co., Inc.*, 19 F.C.C. 2d 433 (1969), a case involving the transfer of KTVH–TV in Hutchinson, Kansas, to the owner of WKY–TV, in Oklahoma City. In that case, the Commission compared the two stations' percentages of programming expenditures to profits and gross revenue to attempt to determine if the transferee would better serve the public interest than the transferor. Alianza also cited *Citizens Communications Center* v. *FCC*, 447 F 2d 1201 (D.C. Circuit, June 11, 1971) in which the Court suggested that ". . . one test of superior service should certainly be whether and to what extent the incumbent has reinvested the profit on his license to the service of the viewing and listening public."

[54] *Alianza, supra* note 51, 25 R.R. 2d at 20002.

[55] *Id.*

[56] FCC 72–1068 (Released December 1, 1972).

[57] *Id.*, at pp. 2–3.

[58] In so holding the Commission pointed to a series of analogous cases, including *Multivision, et al, supra* note 47.

The Stern Community Law Firm, counsel for Alianza in that dispute, took the Commission at its word and proceeded to file a petition for just such a rulemaking, looking toward the adoption of rules (1) to permit public inspection of all FCC forms 324, "Annual Financial Report of Networks and Licensees of Broadcast Stations" at the offices of the Commission and at the offices of individual networks and broadcast licensees, and (2) to amend FCC form 324 to require each broadcast licensee to list its programming expenditures in four programming categories—news, public affairs, all other (excluding entertainment and sports), and total local programming.

Earlier this year the Commission staff, obviously feeling somewhat boxed in by its position in the *Alianza* oral argument, brought up a Notice of Proposed Rulemaking, based on the Stern petition, for Commission consideration.[59] While the Notice proposed no specific amendments to existing Rules, it did invite comments on the Stern Firm suggestions and indicated an open mind rather than any specific position on the proposed changes. The Commission majority was not nearly so troubled, however, by the considerations of inconsistent prior positions, and it quickly consigned the proposal to an early demise, with clear instructions to the staff to withdraw its proposed Notice and substitute a decision denying the Stern Firm petition. The latter document has not yet come up for consideration, but one would have to assume that the cumbersome case-by-case process will continue to be the law in this area, and that the result will be simply to ensure that future licensees will no longer attempt to defend themselves on financially-based grounds.[60]

The form 324 financial information, while not available to the seminar students, was available to members of the Commissioner's staff. It has been utilized in preparing this report in such fashion as not to reveal any information still currently held to be confidential.[61]

Ideally, we would have preferred to rank the stations in this report by reporting their total "programming expenses" in dollars (the only "programming" item listed separately on form 324, a sample of which is included at the end of this Part) and their profit. This could be expressed as a ratio. We were unable to do this for a variety of reasons. For one, it would have been difficult to rank the stations in such a manner without revealing something more than we feel we are allowed by law to reveal. In addition, a small handful of the stations on our list reported no profit at all, and any ranking based on a program expenses to profit ratio would have necessarily eliminated those stations. Nevertheless, we feel such a ranking would be useful if and when the financial information is ever made available to the public.

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[59] Unreleased staff memorandum.

[60] Even though this document was never publicly released, I discuss it here because I recorded a dissenting vote to the decision to "recommit" the staff document for modification.

[61] It is possible, however, for a member of the public to obtain complete financial information, in totals for any *three* stations in a broadcasting market.

The method we have chosen to use, and the basis for the table below, is simply to rank the stations in the study on the basis of programming expenses as a percentage of gross revenues. This method leaves much to be desired, primarily because of the differences in methods of accounting and the lack of specificity in the figures reported, but this is the only information available to the Commission, and we feel it can be significant in a relative perspective. That is, the station that can be shown to be spending 47% of its gross revenues on programming is, we feel, doing a better job than the station spending just 25% of its revenues. The stations have been ranked, then, on the basis of that factor, although the table eliminates any reference to either the dollar figures or even the percentages involved.[62]

*Network Affiliates Ranked by the Ratio of Program Expenses/Gross Revenues*

| Rank | Call letters | Net. aff. | Mkt. No. | Location |
|---|---|---|---|---|
| 1 | WABC | ABC | 1 | New York City |
| 2 | KGW | NBC | 26 | Portland |
| 3 | KING | NBC | 16 | Seattle-Tacoma |
| 4 | WAST | ABC | 37 | Albany-Schenectady-T |
| 5 | KOVR | ABC | 27 | Sacramento-Stockton |
| 6 | KSL | CBS | 50 | Salt Lake City |
| 7 | WRC | NBC | 10 | Washington, D.C. |
| 8 | WIIC | NBC | 9 | Pittsburgh |
| 9 | WMAL | ABC | 10 | Washington, D.C. |
| 10 | WSYR | NBC | 43 | Syracuse |
| 11 | KUTV | NBC | 50 | Salt Lake City |
| 12 | KOIN | CBS | 26 | Portland |
| 13 | KATU | ABC | 26 | Portland |
| 14 | WZZM | ABC | 41 | Kalamazoo-Gr Rapids |
| 15 | WTAE | ABC | 9 | Pittsburgh |
| 16 | WSM | NBC | 30 | Nashville |
| 17 | KABC | ABC | 2 | Los Angeles |
| 18 | WNYS | ABC | 43 | Syracuse |
| 19 | KTVI | ABC | 12 | St. Louis |
| 20 | WHAS | CBS | 36 | Louisville |
| 21 | WXII | NBC | 48 | Gnsb-High Pt-Win Sal |
| 22 | WSIX | ABC | 30 | Nashville |
| 23 | WLKY | ABC | 36 | Louisville |
| 24 | WJZ | ABC | 19 | Baltimore |
| 25 | KWTV | CBS | 41 | Oklahoma City |
| 26 | WXYZ | ABC | 5 | Detroit |
| 27 | WCBS | CBS | 1 | New York City |
| 28 | KOMO | ABC | 16 | Seattle-Tacoma |
| 29 | WDHO | ABC | 45 | Toledo |
| 30 | KGO | ABC | 8 | San Francisco |
| 31 | WWL | CBS | 31 | New Orleans |
| 32 | WTEV | ABC | 34 | Providence |
| 33 | WCPO | CBS | 20 | Cincinnati |
| 34 | WVUE | ABC | 31 | New Orleans |
| 35 | KNBC | NBC | 2 | Los Angeles |
| 36 | KMOX | CBS | 12 | St. Louis |
| 37 | WLWI | ABC | 14 | Indianapolis |
| 38 | KSAT | ABC | 45 | San Antonio |
| 39 | WTEN | CBS | 37 | Albany-Schenectady-T |
| 40 | KCPX | ABC | 50 | Salt Lake City |
| 41 | WITI | ABC | 21 | Milwaukee |
| 42 | KBTV | ABC | 32 | Denver |
| 43 | WKYC | NBC | 7 | Cleveland |
| 44 | WLWT | NBC | 20 | Cincinnati |
| 45 | WPVI | ABC | 4 | Philadelphia |
| 46 | WTVJ | CBS | 18 | Miami |
| 47 | WSOC | NBC | 35 | Charlotte |
| 48 | KTAR | NBC | 45 | Phoenix |

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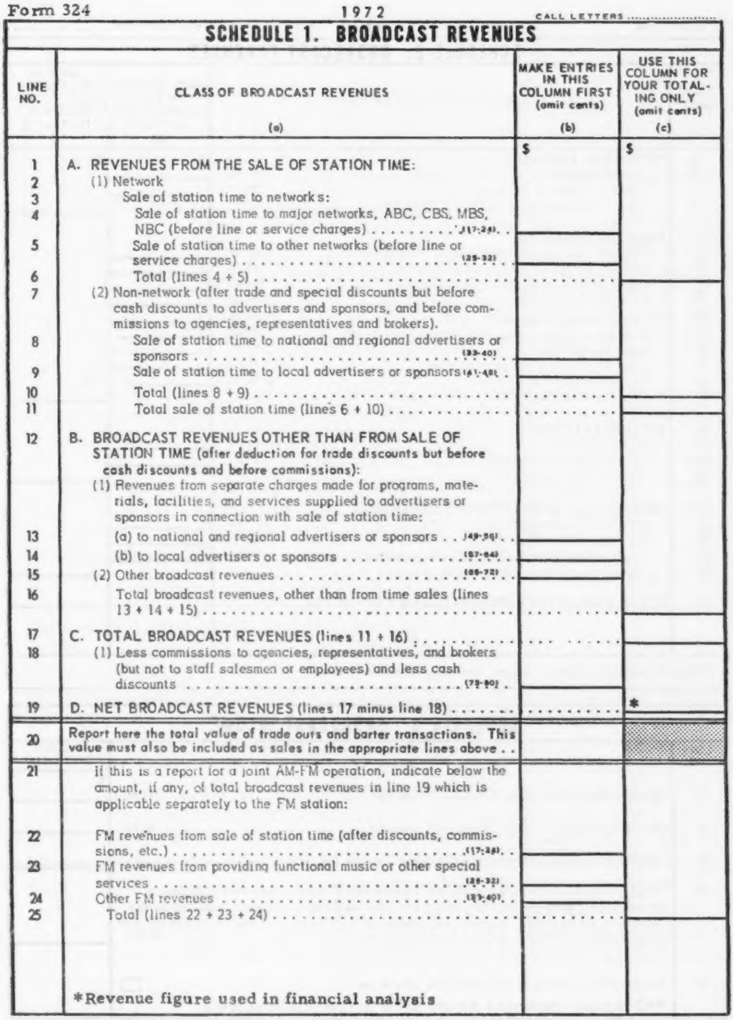
[62] That percentage was used. however. in the computer analysis to determine more accurately the stations' relative positions. See the more detailed discussion of the methodology in Appendix A.

*Network Affiliates Ranked by the Ratio of Program Expenses/Gross Revenues*—Cont.

| Rank | Call letters | Net. aff. | Mkt. No. | Location |
|---|---|---|---|---|
| 49 | WLAC | CBS | 30 | Nashville |
| 50 | WTOP | CBS | 10 | Washington D.C. |
| 51 | WTVT | CBS | 24 | Tampa-St. Petersburg |
| 52 | WPLG | ABC | 18 | Miami |
| 53 | KOCO | ABC | 41 | Oklahoma City |
| 54 | WHEN | CBS | 43 | Syracuse |
| 55 | WDSU | NBC | 31 | New Orleans |
| 56 | WEWS | ABC | 7 | Cleveland |
| 57 | KDKA | CBS | 9 | Pittsburgh |
| 58 | WNBC | NBC | 1 | New York City |
| 59 | WNAC | ABC | 6 | Boston |
| 60 | WLOS | ABC | 40 | Gnville-Sptnbg-Ashvi |
| 61 | WBNS | CBS | 28 | Columbus |
| 62 | KGTV | NBC | 49 | San Diego |
| 63 | WAPI | NBC | 38 | Birmingham |
| 64 | WRTV | NBC | 14 | Indianapolis |
| 65 | WBBM | CBS | 3 | Chicago |
| 66 | KXTV | CBS | 27 | Sacramento-Stockton |
| 67 | WOTV | NBC | 41 | Kalamazoo-Gr Rapids |
| 68 | WLS | ABC | 3 | Chicago |
| 69 | KCRA | NBC | 27 | Sacramento-Stockton |
| 70 | WKY | NBC | 41 | Oklahoma City |
| 71 | KSTP | NBC | 13 | Minneapolis-St Paul |
| 72 | WCCO | CBS | 13 | Minneapolis-St Paul |
| 73 | WCAU | CBS | 4 | Philadelphia |
| 74 | WMAQ | NBC | 3 | Chicago |
| 75 | KTVK | ABC | 45 | Phoenix |
| 76 | WFMY | CBS | 48 | Gnsb-High Pt-Win Sal |
| 77 | WJW | CBS | 7 | Cleveland |
| 78 | WFLA | NBC | 24 | Tampa-St. Petersburg |
| 79 | WAGA | CBS | 17 | Atlanta |
| 80 | WBEN | CBS | 25 | Buffalo |
| 81 | WGR | NBC | 25 | Buffalo |
| 82 | WISN | CBS | 21 | Milwaukee |
| 83 | WLWD | NBC | 39 | Dayton |
| 84 | WAVY | NBC | 44 | Norf-Newp News-Hamp |
| 85 | WFAA | ABC | 11 | Dallas-Fort Worth |
| 86 | WAVE | NBC | 36 | Louisville |
| 87 | WHIO | CBS | 39 | Dayton |
| 88 | KNXT | CBS | 2 | Los Angeles |
| 89 | WTMJ | NBC | 21 | Milwaukee |
| 90 | KMBC | ABC | 23 | Kansas City |
| 91 | WJAR | NBC | 34 | Providence |
| 92 | WMC | NBC | 29 | Memphis |
| 93 | WOAI | NBC | 45 | San Antonio |
| 94 | KPRC | NBC | 15 | Houston |
| 95 | WVEC | ABC | 44 | Norfolk-Newp News-Hamp |
| 96 | WLCY | ABC | 24 | Tampa-St. Petersburg |
| 97 | KCMO | CBS | 23 | Kansas City |
| 98 | KMGH | CBS | 32 | Denver |
| 99 | WQXI | ABC | 17 | Atlanta |
| 100 | KIRK | ABC | 15 | Houston |
| 101 | WBAL | NBC | 19 | Baltimore |
| 102 | WHTN | ABC | 33 | Charleston-Huntington |
| 103 | KPIX | CBS | 8 | San Francisco |
| 104 | WMAR | CBS | 19 | Baltimore |
| 105 | WTVN | ABC | 28 | Columbus |
| 106 | WJBK | CBS | 5 | Detroit |
| 107 | WSPD | NBC | 45 | Toledo |
| 108 | KSD | NBC | 12 | St. Louis |
| 109 | WKBW | ABC | 25 | Buffalo |
| 110 | WTIC | CBS | 22 | Hartford-New Haven |
| 111 | WHBQ | ABC | 29 | Memphis |
| 112 | WWJ | NBC | 5 | Detroit |
| 113 | WPRI | CBS | 34 | Providence |
| 114 | WREC | CBS | 29 | Memphis |
| 115 | WBAP | NBC | 11 | Dallas-Fort Worth |
| 116 | WSB | NBC | 17 | Atlanta |
| 117 | WCKT | NBC | 18 | Miami |
| 118 | WLWC | NBC | 28 | Columbus |
| 119 | KOOL | CBS | 45 | Phoenix |
| 120 | WBTV | CBS | 35 | Charlotte |
| 121 | WSPA | CBS | 40 | Gnville-Sptnbg-Ashvi |
| 122 | WTOL | CBS | 45 | Toledo |
| 123 | KYW | NBC | 4 | Philadelphia |
| 124 | WTNH | ABC | 22 | Hartford-New Haven |
| 125 | KIRO | CBS | 16 | Seattle-Tacoma |
| 126 | KMSP | ABC | 13 | Minneapolis-St. Paul |
| 127 | KHOU | CBS | 15 | Houston |

*Network Affiliates Ranked by the Ratio of Program Expenses/Gross Revenues*—Cont.

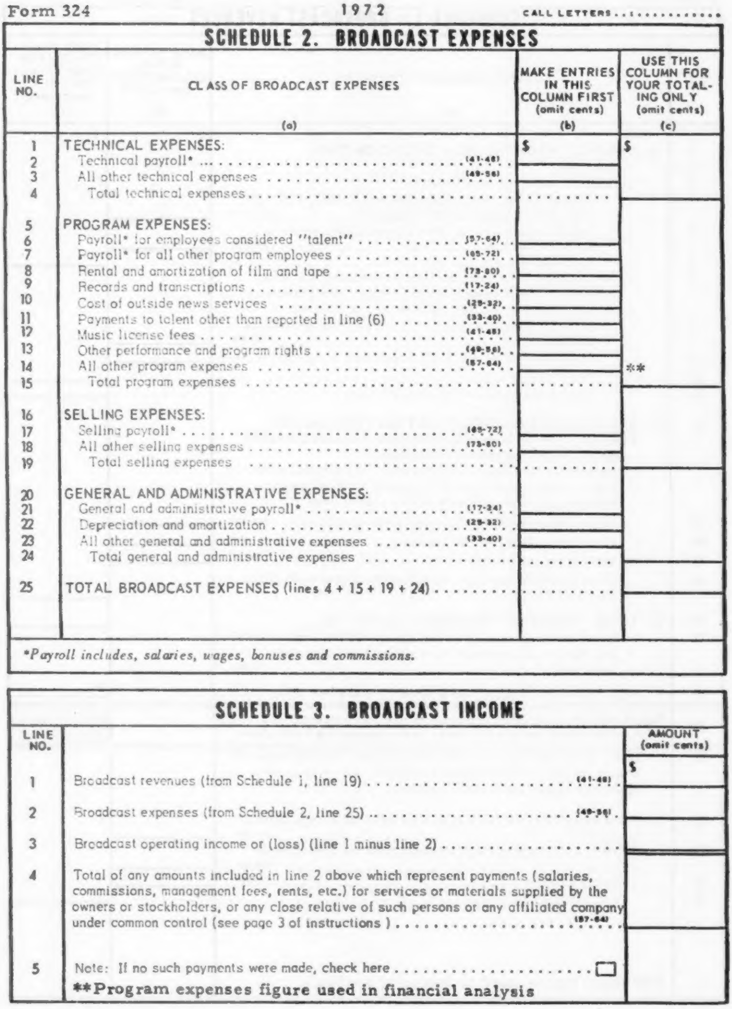
| Rank | Call letters | Net. aff. | Mkt. No. | Location |
|---|---|---|---|---|
| 128 | KFMB | CBS | 49 | San Diego |
| 129 | WRGB | NBC | 37 | Albany-Schenectady-T |
| 130 | WFBC | NBC | 40 | Gnville-Sptnbg-Ashvi |
| 131 | WDAF | NBC | 23 | Kansas City |
| 132 | KOA | NBC | 32 | Denver |
| 133 | WKRC | ABC | 20 | Cincinnati |
| 134 | KENS | CBS | 45 | San Antonio |
| 135 | WISH | CBS | 14 | Indianapolis |
| 136 | WHNB | NBC | 22 | Hartford-New Haven |
| 137 | WCCB | ABC | 35 | Charlotte |
| 138 | WBZ | NBC | 6 | Boston |
| 139 | WSAZ | NBC | 33 | Charleston-Huntingto |
| 140 | WCHS | CBS | 33 | Charleston-Huntingto |
| 141 | KDFW | CBS | 11 | Dallas-Fort Worth |
| 142 | WKZO | CBS | 41 | Kalamazoo-Gr Rapids |
| 143 | WBMG | CBS | 38 | Birmingham |
| 144 | WBRC | ABC | 38 | Birmingham |



Form 324 1972 CALL LETTERS ....................

## SCHEDULE 1. BROADCAST REVENUES

| LINE NO. | CLASS OF BROADCAST REVENUES<br>(a) | MAKE ENTRIES IN THIS COLUMN FIRST (omit cents)<br>(b) | USE THIS COLUMN FOR YOUR TOTALING ONLY (omit cents)<br>(c) |
|---|---|---|---|
|  |  | $ | $ |
| 1 | A. REVENUES FROM THE SALE OF STATION TIME: |  |  |
| 2 | (1) Network |  |  |
| 3 | Sale of station time to networks: |  |  |
| 4 | Sale of station time to major networks, ABC, CBS, MBS, NBC (before line or service charges) ........ (17-24) . . |  |  |
| 5 | Sale of station time to other networks (before line or service charges) ........................ (25-32) . . |  |  |
| 6 | Total (lines 4 + 5) ........................ | .......... |  |
| 7 | (2) Non-network (after trade and special discounts but before cash discounts to advertisers and sponsors, and before commissions to agencies, representatives and brokers). |  |  |
| 8 | Sale of station time to national and regional advertisers or sponsors ........................ (33-40) . . |  |  |
| 9 | Sale of station time to local advertisers or sponsors (41-48) . |  |  |
| 10 | Total (lines 8 + 9) ........................ | .......... |  |
| 11 | Total sale of station time (lines 6 + 10) .............. | .......... |  |
| 12 | B. BROADCAST REVENUES OTHER THAN FROM SALE OF STATION TIME **(after deduction for trade discounts but before cash discounts and before commissions):**<br>(1) Revenues from separate charges made for programs, materials, facilities, and services supplied to advertisers or sponsors in connection with sale of station time: |  |  |
| 13 | (a) to national and regional advertisers or sponsors . . (49-56) . . |  |  |
| 14 | (b) to local advertisers or sponsors .............. (57-64) . . |  |  |
| 15 | (2) Other broadcast revenues ........................ (65-72) . . |  |  |
| 16 | Total broadcast revenues, other than from time sales (lines 13 + 14 + 15) ........................ | .... ..... |  |
| 17 | C. TOTAL BROADCAST REVENUES **(lines 11 + 16)** .............. | ... ..... |  |
| 18 | (1) Less commissions to agencies, representatives, and brokers (but not to staff salesmen or employees) and less cash discounts ........................ (73-80) . |  |  |
| 19 | D. NET BROADCAST REVENUES **(lines 17 minus line 18)** ....... | .......... | * |
| 20 | **Report here the total value of trade outs and barter transactions. This value must also be included as sales in the appropriate lines above . .** |  | ▨ |
| 21 | If this is a report for a joint AM-FM operation, indicate below the amount, if any, of total broadcast revenues in line 19 which is applicable separately to the FM station: |  |  |
| 22 | FM revenues from sale of station time (after discounts, commissions, etc.) ........................ (17-24) . . |  |  |
| 23 | FM revenues from providing functional music or other special services ........................ (25-32) . . |  |  |
| 24 | Other FM revenues ........................ (33-40) . . |  |  |
| 25 | Total (lines 22 + 23 + 24) ........................ | .......... |  |
|  | ***Revenue figure used in financial analysis** |  |  |



Form 324 1972 CALL LETTERS..............

## SCHEDULE 2. BROADCAST EXPENSES

| LINE NO. | CLASS OF BROADCAST EXPENSES<br>(a) | MAKE ENTRIES IN THIS COLUMN FIRST (omit cents)<br>(b) | USE THIS COLUMN FOR YOUR TOTALING ONLY (omit cents)<br>(c) |
|---|---|---|---|
| 1 | TECHNICAL EXPENSES: | $ | $ |
| 2 | Technical payroll* ... (41-48) | | |
| 3 | All other technical expenses (49-56) | | |
| 4 | Total technical expenses | | |
| 5 | PROGRAM EXPENSES: | | |
| 6 | Payroll* for employees considered "talent" (57-64) | | |
| 7 | Payroll* for all other program employees (65-72) | | |
| 8 | Rental and amortization of film and tape (73-80) | | |
| 9 | Records and transcriptions (17-24) | | |
| 10 | Cost of outside news services (25-32) | | |
| 11 | Payments to talent other than reported in line (6) (33-40) | | |
| 12 | Music license fees (41-48) | | |
| 13 | Other performance and program rights (49-56) | | |
| 14 | All other program expenses (57-64) | | ** |
| 15 | Total program expenses | | |
| 16 | SELLING EXPENSES: | | |
| 17 | Selling payroll* (65-72) | | |
| 18 | All other selling expenses (73-80) | | |
| 19 | Total selling expenses | | |
| 20 | GENERAL AND ADMINISTRATIVE EXPENSES: | | |
| 21 | General and administrative payroll* (17-24) | | |
| 22 | Depreciation and amortization (25-32) | | |
| 23 | All other general and administrative expenses (33-40) | | |
| 24 | Total general and administrative expenses | | |
| 25 | TOTAL BROADCAST EXPENSES (lines 4 + 15 + 19 + 24) | | |

**Payroll includes, salaries, wages, bonuses and commissions.*

## SCHEDULE 3. BROADCAST INCOME

| LINE NO. | | AMOUNT (omit cents) |
|---|---|---|
| 1 | Broadcast revenues (from Schedule 1, line 19) (41-48) | $ |
| 2 | Broadcast expenses (from Schedule 2, line 25) (49-56) | |
| 3 | Broadcast operating income or (loss) (line 1 minus line 2) | |
| 4 | Total of any amounts included in line 2 above which represent payments (salaries, commissions, management fees, rents, etc.) for services or materials supplied by the owners or stockholders, or any close relative of such persons or any affiliated company under common control (see page 3 of instructions ) (57-64) | |
| 5 | Note: If no such payments were made, check here ☐ | |

****Program expenses figure used in financial analysis**

# CHAPTER 2

## EMPLOYMENT

### I. INTRODUCTION

In June, 1969, the FCC issued formal rules forbidding employment discrimination by radio and television stations based upon race, color, national origin, or sex.[1] The Commission's duty to issue such rules is rooted in the national policy against discrimination in employment, as embodied in Title VII of the 1964 Civil Rights Act,[2] as well as the Communication Act's broad directive that all broadcast licensees serve the "public interest, convenience and necessity."

The public interest standard and the national policy take on added importance when the unique nature of broadcasting is considered. The broadcast licensee, as a "public trustee" given profitable, private use of an influential piece of public property, can only continue to be entrusted with that use if it lives up to the Commission's affirmative and enforceable public interest obligations, including obligations relating to employment.

To enable the FCC to monitor station compliance with its equal employment opportunities ruling, the broadcaster is required to submit two documents: (1) his station's equal employment opportunity plan, and (2) an employment report. The equal employment opportunity program is submitted as part of the applicant's license renewal form.[3] The employment report (form 395), which records the number and position of workers by race and sex, is by far the more objective and significant of the two and must be submitted annually.[4] It is data from this second document that is the basis for the employment rankings and statistics of our network affiliates study. (A sample of the form is included at the end of this chapter.)

The Commission has been collecting form 395 only since 1971.[5] Nevertheless, it has become clear in that very short time that neither the Broadcast Bureau nor a majority of the Commissioners have any intention of improving the questionable employment practices this data has revealed in a large percentage of the licensees. There are two tough questions that must be answered before any gains can be made in the employment of minorities or women in broadcasting today. Neither has been treated seriously by the Commission. They are: (1) What are to be the standards for licensee compliance with the Commission rules (and the federal law) concerning equal employment opportunity? (2) What are to be the penalties for non-compliance?

The latter question should be easy enough to answer. Theoretically, the FCC penalties for non-compliance could range from temporary deferral of license renewal, pending further Commission inquiry into the applicant's employment program or practices, to an outright denial of the application for renewal following a hearing. A penalty between deferral and denial might include subjecting the licensee to the forfeiture (fines) provisions of Section 503 of the Communications Act. All have their precedent in other areas of Commission regulation, and proper penalties could be readily determined once the standards for compliance were set.

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[1] 47 C.F.R. § 73.680.

[2] 42 U.S.C. § 2000 e–2 (1964).

[3] § VI(b) of FCC Broadcast Renewal application form 303 calls for the applicant to outline for the Commission his proposals for conforming his policies to the FCC rules regarding equal employment opportunities.

[4] 47 C.F.R. § 1.612.

[5] *See Report and Order in Matter of Petition for Rulemaking to Require Broadcast Licensees to Show Nondiscrimination in their Employment Practices*, 23 FCC 2d 430 (1970).

The Commission's derogation of its responsibility to answer the first question, therefore, is a far more serious one. Prodded perhaps by the presence of the first black Commissioner in the FCC's history (Commissioner Benjamin Hooks), the Commission finally decided last August to do "something" about the equal opportunity information received with the license renewal applications.[6] But the majority was content merely to send letters to a small handful of licensees, "requesting additional information on the licensees' efforts to provide equal employment opportunity to minority persons and women." It seemed to me we should have come up with something more than that weakly-phrased missive, and I dissented.[7] But even that letter was only sent to stations having eleven or more employees, in areas with five per cent or greater minority population, when the form 395's reported (1) a decline in minority employees from one year to the next, or (2) no minority employees in the past year, or (3) no women employees in the past year. Note how severely restrictive those standards are. For example, a television station with sixty employees, one of whom was black, would not get a letter of inquiry—so long as it did not experience a *decline* in minority employment.

There are other serious inconsistencies in this method of dealing with the problem. A station with sixty employees whose minority employment had declined from thirty to twenty eight, for example, would, under these guidelines, receive a letter despite its fine overall showing. A station with a serious deficiency (and decline) in *female* employment would not even be considered unless the station's area had a five per cent or greater *minority* employment, thus requiring enforcement of solutions to the former problem to rely on a completely unrelated "threshold" criteria related to the latter.

Even within this restrictive (and illogical) "solution" to the equal employment problem, the Commission has failed to demonstrate any positive concern for effectively dealing with discrimination. Although the first of the letters were sent out in August, 1972, the responses from the licensees were in most cases still awaiting action by the Broadcast Bureau staff in mid-1973, and no further Commission-initiated action has been taken with regard to even the most blatant offenders.[8] "We're just kind of waiting around with the [broadcasters'] replies [to the FCC inquiries]," was the response of one Broadcast Bureau official to the query of a concerned citizen. "We don't really know what we could do about licensees who don't employ fairly anyway." [9] This attitude is taken despite the same official's earlier admission that any of the potential courses of action outlined above (hearing, denial of renewal, fine) could be easily initiated at any moment.

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[6] See my dissent in *Letter to Reverend Everett C. Parker,* FCC 72–438, 24 P & F Radio Reg. 2d 396, 398 (1972), a Commission decision handed down just two months before Commissioner Hooks' arrival. *See also* my extensive study of employment discrimination among stations in the Pennsylvania-Delaware renewal package, which may also have had some affect on the Commission majority, *Equal Employment Opportunity Inquiry,* 36 FCC 2d 515, 517 (1972).

[7] *Pennsylvania and Delaware Broadcasting Stations,* 38 FCC 2d 158 (1972).

[8] Indeed, a number of the stations, after nothing but the passage of time, were simply renewed.

Thus, the Commission leaves itself open to the charge that it is quietly searching, not for an effective course of action that would begin to reverse the traditional patterns of discrimination in the broadcasting industry, but for some course of action that would mollify critics without adversely affecting its "business-as-usual" rubber stamping of renewals.[10] That this is the Commission's true attitude is further evidenced by its "reassuring" statements to the effect that the data on form 395 annual reports is "chiefly" valuable to determine *industry-wide* employment trends, and that, in regard to individual stations, it is not to be suggested "that such data for any particular year would demonstrate the existence of discrimination of any station." [11]

In this study of the network affiliates in the top 50 markets we take issue with that contention—that a case for discrimination cannot be based upon a reading of the annual employment data of an individual station. We also dispute the *implied* contention that discrimination in employment has no important relation to the service of a licensee in the "public interest, convenience or necessity."

We have not included our employment analysis in the overall station ranking found in chapter 1. We have omitted it, however, only because that ranking was designed to evaluate programming, not because we consider employment discrimination any less important than programming. Indeed, the argument could well be made that licensee discrimination against minorities or women, especially in those jobs with a greater degree of influence on programming creation and decision-making, is as directly related to the station's programming as any of the other factors on which we have been able to gather information. Be that as it may, we have chosen to treat employment separately from programming. (1) We believe that community groups other than those oriented specifically towards quality programming will be able more effectively to consider employment if the information is presented in this manner. (2) It is our intention that this chapter complement an excellent survey of all 609 commercial TV stations already conducted and published by the Office of Communication of the United Church of Christ in 1972.[12]

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[9] Interview with an anonymous analyst in the Renewal Branch of the FCC Broadcast Bureau, March, 1973.

[10] All the interested reader need do is compare the Commission's disposition of the WLBT renewal proceeding, *Lamar Life Broadcasting Co.*, 14 FCC 2d 431 (1968), with the stinging reversal of the D.C. Circuit Court of Appeals, *Office of Communications of the United Church of Christ* v. *FCC*, 359 F. 2d 994 (1969); the Court outlined in detail the flagrant, long-standing discrimination of the licensee, in areas of programming as well as employment.

[11] 23 F.C.C. 2d 430, 431 (1970).

[12] Jennings, *Television Station Employment Practices: The Status of Minorities and Women*, Office of Communication, United Church of Christ, November, 1972.

## II. ANALYSIS OF MINORITY EMPLOYMENT

### A. *Total Employment*

We have made the assumption that minority employment statistics for the top 50 markets can be compared and ranked most effectively—and fairly to the broadcasters—by taking into consideration the percentage of minorities in the population of the Standard Metropolitan Statistical Areas (SMSA) of the stations involved.[13] For example, it would be less defensible, we felt, to compare the minority employment performance of a network affiliate in Washington, D.C. (with an SMSA minority population of 28.3%) with that of one in Minneapolis-St. Paul (with a minority population of just 3.7%) without accounting, somehow, for the differences between the minority employment pool of the two cities. Thus, we have ranked the licensees by relating their minority employment to the minority population in the SMSA. The result is a "factor" comparing two percentages. A station receiving a factor of 1.000 would be employing exactly the same *percentage* of minorities in the station as exist in the population of his area. The station ranked 26th, for example, WKYC, Cleveland, employs 17.62% minorities in an SMSA with a minority population of 17.6%, for a "factor" of 1.001. The top station in the ranking, WTEV, Providence, employs 8.33% minorities in an area with a 3.4% minority population, for a factor of 2.451. While this method of ranking does tend to favor stations in a region with a lower minority population, we would point out that a number of such stations, in markets like Salt Lake City and Minneapolis-St. Paul, nevertheless found themselves at the very bottom of our study.

It is our opinion that a licensee with a factor of less than 1.000 deserves, at a minimum, some further inquiry into its program of employment. It is rather appalling to note that some 82% of the stations in our study have total employment factors of less than 1.000, and more than 35% of them have factors of less than 0.500. Certainly the latter group deserves a more serious inquiry.

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[13] Our source for this information was the U.S. Bureau of the Census. The precise figure we required, however, included Spanish-surnamed people among "minorities" in an SMSA and was nowhere printed in an official publication. We had to go directly to the Bureau in Washington for the information.

*Network Affiliates Ranked by Ratio of Percent Minorities Employed to Percent Minorities in SMSA*

| Rank | Call letters | Net. Aff. | Mkt. No. | Location | SMSA | Total employes | Minorities employed |  | Factor |
|---|---|---|---|---|---|---|---|---|---|
|  |  |  |  |  |  |  | Number | Percent |  |
| 1 | WTEV | ABC | 34 | Providence | 3.4% | 72 | 6 | 8.33% | 2.451 |
| 2 | WNYS | ABC | 43 | Syracuse | 5.0% | 77 | 8 | 10.39% | 2.078 |
| 3 | WPRI | CBS | 34 | Providence | 3.4% | 76 | 5 | 6.58% | 1.935 |
| 4 | WBZ | NBC | 6 | Boston | 6.8% | 175 | 23 | 13.14% | 1.933 |
| 5 | WSAZ | NBC | 33 | Charleston-Huntington | 4.7% | 81 | 7 | 8.64% | 1.839 |
| 6 | KING | NBC | 16 | Seattle-Tacoma | 8.0% | 136 | 19 | 13.97% | 1.746 |
| 7 | KGW | NBC | 26 | Portland | 5.2% | 126 | 11 | 8.73% | 1.679 |
| 8 | WHTN | ABC | 33 | Charleston-Huntington | 4.7% | 51 | 4 | 7.84% | 1.669 |
| 9 | WHEN | CBS | 43 | Syracuse | 5.0% | 75 | 6 | 8.00% | 1.600 |
| 10 | WCHS | CBS | 33 | Charleston-Huntington | 4.7% | 54 | 4 | 7.41% | 1.576 |
| 11 | KDKA | CBS | 9 | Pittsburgh | 7.8% | 167 | 19 | 11.38% | 1.459 |
| 12 | WAST | ABC | 37 | Albany-Schenectady | 4.4% | 63 | 4 | 6.35% | 1.443 |
| 13 | KWTV | CBS | 41 | Oklahoma City | 12.6% | 88 | 16 | 18.18% | 1.443 |
| 14 | WSYR | NBC | 43 | Syracuse | 5.0% | 101 | 7 | 6.93% | 1.386 |
| 15 | WLWC | NBC | 28 | Columbus | 12.6% | 93 | 16 | 17.20% | 1.365 |
| 16 | WOTV | NBC | 41 | Kalamazoo-Gr. Rapids | 6.1% | 109 | 9 | 8.26% | 1.354 |
| 17 | KOCO | ABC | 41 | Oklahoma City | 12.6% | 77 | 13 | 16.88% | 1.340 |
| 18 | WTVN | ABC | 28 | Columbus | 12.6% | 90 | 15 | 16.67% | 1.323 |
| 19 | WNAC | CBS | 6 | Boston | 6.8% | 167 | 15 | 8.98% | 1.321 |
| 20 | WTEN | CBS | 37 | Albany-Schenectady | 4.4% | 76 | 4 | 5.26% | 1.196 |
| 21 | KATU | ABC | 26 | Portland | 5.2% | 98 | 6 | 6.12% | 1.177 |
| 22 | WZZM | ABC | 41 | Kalamazoo-Gr. Rapids | 6.1% | 71 | 5 | 7.04% | 1.154 |
| 23 | WHIO | CBS | 39 | Dayton | 11.9% | 122 | 16 | 13.11% | 1.102 |
| 24 | WIIC | NBC | 9 | Pittsburgh | 7.8% | 144 | 12 | 8.33% | 1.068 |
| 25 | WKBW | ABC | 25 | Buffalo | 9.9% | 87 | 9 | 10.34% | 1.045 |
| 26 | WKYC | NBC | 7 | Cleveland | 17.6% | 193 | 34 | 17.62% | 1.001 |
| 27 | KOIN | CBS | 26 | Portland | 5.2% | 98 | 5 | 5.10% | 0.981 |
| 28 | WCCO | CBS | 13 | Minneapolis-St. Paul | 3.7% | 201 | 7 | 3.48% | 0.941 |
| 29 | WGR | NBC | 25 | Buffalo | 9.9% | 86 | 8 | 9.30% | 0.940 |
| 30 | WKRC | ABC | 20 | Cincinnati | 11.8% | 84 | 9 | 10.71% | 0.908 |
| 31 | KMOX | CBS | 12 | St. Louis | 17.3% | 148 | 23 | 15.54% | 0.898 |
| 32 | WTAE | ABC | 9 | Pittsburgh | 7.8% | 130 | 9 | 6.92% | 0.888 |
| 33 | WBNS | CBS | 28 | Columbus | 12.6% | 127 | 14 | 11.02% | 0.875 |
| 34 | KABC | ABC | 2 | Los Angeles | 32.9% | 192 | 55 | 28.65% | 0.871 |
| 35 | WJAR | NBC | 34 | Providence | 3.4% | 102 | 3 | 2.94% | 0.865 |
| 36 | WLWT | NBC | 20 | Cincinnati | 11.8% | 206 | 21 | 10.19% | 0.864 |
| 37 | WLWD | NBC | 39 | Dayton | 11.9% | 107 | 11 | 10.28% | 0.864 |
| 38 | WTOL | CBS | 45 | Toledo | 10.5% | 79 | 7 | 8.86% | 0.844 |
| 39 | KIRO | CBS | 16 | Seattle-Tacoma | 8.0% | 119 | 8 | 6.72% | 0.840 |
| 40 | WJBK | CBS | 5 | Detroit | 19.9% | 190 | 31 | 16.32% | 0.820 |
| 41 | WFLA | NBC | 24 | Tampa-St. Petersburg | 16.8% | 124 | 17 | 13.71% | 0.816 |

*Network Affiliates Ranked by Ratio of Percent Minorities Employed to Percent Minorities in SMSA*—Continued

| Rank | Call letters | Net. Aff. | Mkt. No. | Location | SMSA | Total employes | Minorities employed | | Factor |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Number | Percent | |
| 42 | KGO | ABC | 8 | San Francisco | 28.9% | 224 | 52 | 23.21% | 0.803 |
| 43 | WRC | NBC | 10 | Washington, D.C | 28.3% | 227 | 51 | 22.47% | 0.794 |
| 44 | WTMJ | NBC | 21 | Milwaukee | 9.8% | 146 | 11 | 7.53% | 0.769 |
| 45 | KTAR | NBC | 45 | Phoenix | 20.0% | 113 | 17 | 15.04% | 0.752 |
| 46 | WKY | NBC | 41 | Oklahoma City | 12.6% | 119 | 11 | 9.24% | 0.734 |
| 47 | WLWI | ABC | 14 | Indianapolis | 13.4% | 93 | 9 | 9.68% | 0.722 |
| 48 | WTIC | CBS | 22 | Hartford-New Haven | 11.8% | 144 | 12 | 8.33% | 0.706 |
| 49 | WRTV | NBC | 14 | Indianapolis | 13.4% | 127 | 12 | 9.45% | 0.705 |
| 50 | WLOS | ABC | 40 | Gnville-Sptnbc-Ashvi | 13.6% | 76 | 7 | 9.21% | 0.677 |
| 51 | WMAQ | NBC | 3 | Chicago | 23.4% | 342 | 54 | 15.79% | 0.675 |
| 52 | WJW | CBS | 7 | Cleveland | 17.6% | 152 | 18 | 11.84% | 0.673 |
| 53 | KMBC | ABC | 23 | Kansas City | 14.6% | 103 | 10 | 9.71% | 0.665 |
| 54 | WSPD | NBC | 45 | Toledo | 10.5% | 86 | 6 | 6.98% | 0.664 |
| 55 | KNBC | NBC | 2 | Los Angeles | 32.9% | 229 | 50 | 21.83% | 0.664 |
| 56 | WPVI | ABC | 4 | Philadelphia | 19.8% | 153 | 20 | 13.07% | 0.660 |
| 57 | WISH | CBS | 14 | Indianapolis | 13.4% | 80 | 7 | 8.75% | 0.653 |
| 58 | KPIX | CBS | 8 | San Francisco | 28.9% | 165 | 31 | 18.79% | 0.650 |
| 59 | WCAU | CBS | 4 | Philadelphia | 19.8% | 70 | 9 | 12.86% | 0.649 |
| 60 | WFBC | NBC | 40 | Gnville-Sptnbg-Ashvi | 13.6% | 57 | 5 | 8.77% | 0.645 |
| 61 | KCMO | CBS | 23 | Kansas City | 14.6% | 96 | 9 | 9.38% | 0.642 |
| 62 | WBAL | NBC | 19 | Baltimore | 25.1% | 149 | 24 | 16.11% | 0.642 |
| 63 | WLS | ABC | 3 | Chicago | 23.4% | 274 | 41 | 14.96% | 0.639 |
| 64 | WAVE | NBC | 36 | Louisville | 13.0% | 110 | 9 | 8.18% | 0.629 |
| 65 | WINH | ABC | 22 | Hartford-New Haven | 11.8% | 81 | 6 | 7.41% | 0.628 |
| 66 | WTOP | CBS | 10 | Washington, D.C | 28.3% | 136 | 24 | 17.65% | 0.624 |
| 67 | KOOL | CBS | 45 | Phoenix | 20.0% | 105 | 13 | 12.38% | 0.619 |
| 68 | WNBC | NBC | 1 | New York City | 30.3% | 237 | 44 | 18.57% | 0.619 |
| 69 | WHNB | NBC | 22 | Hartford-New Haven | 11.8% | 69 | 5 | 7.25% | 0.614 |
| 70 | WSIX | ABC | 30 | Nashville | 18.7% | 70 | 8 | 11.43% | 0.611 |
| 71 | KFMB | CBS | 49 | San Diego | 20.6% | 113 | 14 | 12.39% | 0.601 |
| 72 | WAGA | CBS | 17 | Atlanta | 23.6% | 141 | 20 | 14.18% | 0.601 |
| 73 | KYW | NBC | 4 | Philadelphia | 19.8% | 202 | 24 | 11.88% | 0.600 |
| 74 | WSPA | CBS | 40 | Gnville-Sptnbg-Ashvi | 13.6% | 74 | 6 | 8.11% | 0.596 |
| 75 | KMGH | CBS | 32 | Denver | 16.8% | 120 | 12 | 10.00% | 0.595 |
| 76 | WCBS | CBS | 1 | New York City | 30.0% | 280 | 50 | 17.86% | 0.595 |
| 77 | WQXI | ABC | 17 | Atlanta | 23.6% | 114 | 16 | 14.04% | 0.595 |
| 78 | KTVI | ABC | 12 | St. Louis | 17.3% | 107 | 11 | 10.28% | 0.594 |
| 79 | KGTV | NBC | 49 | San Diego | 20.6% | 132 | 16 | 12.12% | 0.588 |
| 80 | KDFW | CBS | 11 | Dallas-Fort Worth | 21.3% | 134 | 16 | 11.94% | 0.561 |
| 81 | WBBM | CBS | 3 | Chicago | 23.4% | 300 | 39 | 13.00% | 0.556 |
| 82 | KOMO | ABC | 16 | Seattle-Tacoma | 8.0% | 158 | 7 | 4.43% | 0.554 |
| 83 | WFMY | CBS | 48 | Gnsb-High Pt-Win Sal | 20.3% | 89 | 10 | 11.24% | 0.553 |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| 84 | WLKY | ABC | 36 | Louisville | 13.0% | 56 | 4 | 7.14% | 0.549 |
| 85 | KCPX | ABC | 50 | Salt Lake City | 6.9% | 81 | 3 | 3.70% | 0.537 |
| 86 | KCRA | NBC | 27 | Sacramento-Stockton | 22.0% | 128 | 15 | 11.72% | 0.533 |
| 87 | WMAL | ABC | 10 | Washington, D.C | 28.3% | 140 | 21 | 15.00% | 0.530 |
| 88 | WAVY | NBC | 44 | Norf-Newp News-Hamp | 27.3% | 71 | 10 | 14.08% | 0.516 |
| 89 | WGKP | ABC | 48 | Gnsb-High Pt-Win Sal | 20.3% | 67 | 7 | 10.45% | 0.515 |
| 90 | WSOC | NBC | 35 | Charlotte | 23.9% | 114 | 14 | 12.28% | 0.514 |
| 91 | KSTP | NBC | 13 | Minneapolis-St Paul | 3.7% | 158 | 3 | 1.90% | 0.513 |
| 92 | KTVK | ABC | 45 | Phoenix | 20.0% | 78 | 8 | 10.26% | 0.513 |
| 93 | WITI | ABC | 21 | Milwaukee | 9.8% | 120 | 6 | 5.00% | 0.510 |
| 94 | WWJ | NBC | 5 | Detroit | 19.9% | 149 | 15 | 10.07% | 0.506 |
| 95 | WFAA | ABC | 11 | Dallas-Fort Worth | 21.3% | 186 | 20 | 10.75% | 0.505 |
| 96 | WBAP | NBC | 11 | Dallas-Fort Worth | 21.3% | 141 | 15 | 10.64% | 0.499 |
| 97 | WXYZ | ABC | 5 | Detroit | 19.9% | 213 | 21 | 9.86% | 0.495 |
| 98 | WLAC | CBS | 30 | Nashville | 18.7% | 119 | 11 | 9.24% | 0.494 |
| 99 | WABC | ABC | 1 | New York City | 30.0% | 189 | 28 | 14.81% | 0.494 |
| 100 | WTVT | CBS | 24 | Tampa-St. Petersburg | 16.8% | 123 | 10 | 8.13% | 0.484 |
| 101 | WSB | NBC | 17 | Atlanta | 23.6% | 149 | 17 | 11.41% | 0.483 |
| 102 | KTRK | ABC | 15 | Houston | 30.8% | 101 | 15 | 14.85% | 0.482 |
| 103 | WDAF | NBC | 23 | Kansas City | 14.6% | 73 | 5 | 6.85% | 0.469 |
| 104 | KENS | CBS | 45 | San Antonio | 52.6% | 70 | 17 | 24.29% | 0.462 |
| 105 | WTAR | CBS | 44 | Norf-Newp News-Hamp | 27.3% | 106 | 13 | 12.26% | 0.449 |
| 106 | KHOU | CBS | 15 | Houston | 30.8% | 94 | 13 | 13.83% | 0.449 |
| 107 | WEWS | ABC | 7 | Cleveland | 17.6% | 140 | 11 | 7.86% | 0.446 |
| 108 | KOVR | ABC | 27 | Sacramento-Stockton | 22.0% | 103 | 10 | 9.71% | 0.441 |
| 109 | WREC | CBS | 29 | Memphis | 38.4% | 71 | 12 | 16.90% | 0.440 |
| 110 | WHBO | ABC | 29 | Memphis | 38.4% | 78 | 13 | 16.67% | 0.434 |
| 111 | WMAR | CBS | 19 | Baltimore | 25.1% | 147 | 16 | 10.88% | 0.434 |
| 112 | KNXT | CBS | 2 | Los Angeles | 32.9% | 317 | 44 | 13.88% | 0.422 |
| 113 | KBTV | ABC | 32 | Denver | 16.8% | 113 | 8 | 7.08% | 0.421 |
| 114 | KRON | NBC | 8 | San Francisco | 28.9% | 207 | 25 | 12.08% | 0.418 |
| 115 | WDSU | NBC | 31 | New Orleans | 35.6% | 136 | 20 | 14.71% | 0.413 |
| 116 | WTVJ | CBS | 18 | Miami | 39.1% | 155 | 25 | 16.13% | 0.413 |
| 117 | WVUE | ABC | 31 | New Orleans | 35.6% | 90 | 13 | 14.44% | 0.406 |
| 118 | WISN | CBS | 21 | Milwaukee | 9.8% | 101 | 4 | 3.96% | 0.404 |
| 119 | WBMG | CBS | 38 | Birmingham | 30.0% | 33 | 4 | 12.12% | 0.404 |
| 120 | KSAT | ABC | 45 | San Antonio | 52.6% | 80 | 17 | 21.25% | 0.404 |
| 121 | KSD | NBC | 12 | St. Louis | 17.3% | 115 | 8 | 6.96% | 0.402 |
| 122 | WBRC | ABC | 38 | Birmingham | 30.0% | 83 | 10 | 12.05% | 0.402 |
| 123 | WOAI | NBC | 45 | San Antonio | 52.6% | 90 | 19 | 21.11% | 0.401 |
| 124 | WCKT | NBC | 18 | Miami | 39.1% | 134 | 21 | 15.67% | 0.401 |
| 125 | KXTV | CBS | 27 | Sacramento-Stockton | 22.0% | 81 | 7 | 8.64% | 0.393 |
| 126 | WPLG | ABC | 18 | Miami | 39.1% | 137 | 21 | 15.33% | 0.392 |
| 127 | WCPO | CBS | 20 | Cincinnati | 11.8% | 134 | 6 | 4.48% | 0.379 |
| 128 | WJZ | ABC | 19 | Baltimore | 25.1% | 137 | 13 | 9.49% | 0.378 |
| 129 | WSM | NBC | 30 | Nashville | 18.7% | 114 | 8 | 7.02% | 0.375 |
| 130 | WBEN | CBS | 25 | Buffalo | 9.9% | 136 | 5 | 3.68% | 0.371 |
| 131 | WHAS | CBS | 36 | Louisville | 13.0% | 105 | 5 | 4.76% | 0.366 |
| 132 | KPRC | NBC | 15 | Houston | 30.8% | 125 | 14 | 11.20% | 0.364 |

*Network Affiliates Ranked by Ratio of Percent Minorities Employed to Percent Minorities in SMSA*—Continued

| Rank | Call letters | Net. Aff. | Mkt. No. | Location | SMSA | Total employes | Minorities employed | | Factor |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Number | Percent | |
| 133 | WCCB | ABC | 35 | Charlotte | 23.9% | 24 | 2 | 8.33% | 0.349 |
| 134 | WBTV | CBS | 35 | Charlotte | 23.9% | 121 | 10 | 8.26% | 0.346 |
| 135 | WRGB | NBC | 37 | Albany-Schenectady-T | 4.4% | 78 | 1 | 1.28% | 0.291 |
| 136 | WMC | NBC | 29 | Memphis | 38.4% | 82 | 9 | 10.98% | 0.286 |
| 137 | WXII | NBC | 48 | Gnsb-High Pt-Win Sal | 20.3% | 87 | 5 | 5.75% | 0.283 |
| 138 | KOA | NBC | 32 | Denver | 16.8% | 87 | 4 | 4.60% | 0.274 |
| 139 | WWL | CBS | 31 | New Orleans | 35.6% | 109 | 10 | 9.17% | 0.258 |
| 140 | WLCY | ABC | 24 | Tampa-St. Petersburg | 16.8% | 70 | 3 | 4.29% | 0.255 |
| 141 | WVEC | ABC | 44 | Norf-Newp News-Hamp | 27.3% | 78 | 5 | 6.41% | 0.235 |
| 142 | WDHO | ABC | 45 | Toledo | 10.5% | 41 | 1 | 2.44% | 0.232 |
| 143 | WAPI | NBC | 38 | Birmingham | 30.0% | 61 | 4 | 6.56% | 0.219 |
| 144 | KUTV | NBC | 50 | Salt Lake City | 6.9% | 87 | 1 | 1.15% | 0.167 |
| 145 | KSL | CBS | 50 | Salt Lake City | 6.9% | 137 | 1 | 0.73% | 0.106 |
| 146 | KMSP | ABC | 13 | Minneapolis-St. Paul | 3.7% | 59 | 0 | 0.0% | 0.0 |
| 147 | WKZO | CBS | 41 | Kalamazoo-Gr Rapids | 6.1% | 69 | 0 | 0.0% | 0.0 |

### *B. High pay employment*

With the factor developed in the previous section, it would be possible for a station to achieve a relatively high ranking and still employ most of its minorities in low paying, menial positions. Discrimination in filling the higher paying, more influential positions may be every bit as significant to the minority group member discriminated against. In Table 9, therefore, we rank the stations in our study based solely on the percentage of minorities employed in the top five job categories on the reporting form 395 (officials and managers, professionals, technicians, sales workers, and skilled craftsmen). We have not "corrected" the rankings in these categories for the total percentage of minorities in the SMSA because it is our belief that the "market" for most such employees is a national rather than local one.[14]

*Network affiliates ranked by percent minorities employed in high pay positions*

| Rank | Call letters | Net. aff. | Mkt. No. | Location | High pay positions | High pay Minorities employed | |
|---|---|---|---|---|---|---|---|
| | | | | | | Number | Percent |
| 1 | KABC | ABC | 2 | Los Angeles | 162 | 45 | 27.78% |
| 2 | KENS | CBS | 45 | San Antonio | 57 | 12 | 21.05% |
| 3 | KGO | ABC | 8 | San Francisco | 189 | 38 | 20.11% |
| 4 | KSAT | ABC | 45 | San Antonio | 64 | 12 | 18.75% |
| 5 | KNBC | NBC | 2 | Los Angeles | 174 | 29 | 16.67% |
| 6 | WRC | NBC | 10 | Washington D.C. | 170 | 27 | 15.88% |
| 7 | WREC | CBS | 29 | Memphis | 52 | 8 | 15.38% |
| 8 | WLWC | NBC | 28 | Columbus | 73 | 11 | 15.07% |
| 9 | WVUE | ABC | 31 | New Orleans | 74 | 11 | 14.86% |
| 10 | WHBQ | ABC | 29 | Memphis | 61 | 9 | 14.75% |
| 11 | WNBC | NBC | 1 | New York City | 179 | 26 | 14.53% |
| 12 | WTOP | CBS | 10 | Washington D.C. | 111 | 16 | 14.41% |
| 13 | KING | NBC | 16 | Seattle-Tacoma | 112 | 16 | 14.29% |
| 14 | WTVJ | CBS | 18 | Miami | 127 | 18 | 14.17% |
| 15 | KPIX | CBS | 8 | San Francisco | 110 | 15 | 13.64% |
| 16 | WOAI | NBC | 45 | San Antonio | 60 | 8 | 13.33% |
| 17 | WMAL | ABC | 10 | Washington D.C. | 128 | 17 | 13.28% |
| 18 | WKYC | NBC | 7 | Cleveland | 155 | 20 | 12.90% |
| 19 | WCBS | CBS | 1 | New York City | 181 | 23 | 12.71% |
| 20 | WBMG | CBS | 38 | Birmingham | 24 | 3 | 12.50% |
| 21 | WSB | NBC | 17 | Atlanta | 104 | 13 | 12.50% |
| 22 | WSIX | ABC | 30 | Nashville | 58 | 7 | 12.07% |
| 23 | WLOS | ABC | 40 | Gnville-Sptnbg-Ashvl | 58 | 7 | 12.07% |
| 24 | WAGA | CBS | 17 | Atlanta | 109 | 13 | 11.93% |
| 25 | WCKF | NBC | 18 | Miami | 102 | 12 | 11.76% |
| 26 | WPVI | ABC | 4 | Philadelphia | 121 | 14 | 11.57% |
| 27 | WMAQ | NBC | 3 | Chicago | 236 | 27 | 11.44% |
| 28 | WBAL | NBC | 19 | Baltimore | 114 | 13 | 11.40% |
| 29 | WYVN | ABC | 28 | Columbus | 62 | 7 | 11.29% |
| 30 | WLS | ABC | 3 | Chicago | 224 | 25 | 11.16% |
| 31 | KNXT | CBS | 2 | Los Angeles | 253 | 28 | 11.07% |
| 32 | WIAR | CBS | 44 | Norf-Newp News-Hamp | 82 | 9 | 10.98% |
| 33 | WMC | NBC | 29 | Memphis | 64 | 7 | 10.94% |
| 34 | KRON | NBC | 8 | San Francisco | 165 | 18 | 10.91% |
| 35 | KOOL | CBS | 45 | Phoenix | 83 | 9 | 10.84% |
| 36 | KSOU | CBS | 15 | Houston | 75 | 8 | 10.67% |
| 37 | KIRK | ABC | 15 | Houston | 75 | 8 | 10.67% |
| 38 | WGHP | ABC | 48 | Gnsb-High Pt-Win Sal | 57 | 6 | 10.53% |
| 39 | WKRC | ABC | 20 | Cincinnati | 57 | 6 | 10.53% |
| 40 | WAVY | NBC | 44 | Norf-Newp News-Hamp | 58 | 6 | 10.34% |
| 41 | KGTV | NBC | 49 | San Diego | 98 | 10 | 10.20% |
| 42 | KOCO | ABC | 41 | Okahoma City | 59 | 6 | 10.17% |
| 43 | WHTO | CBS | 39 | Dayton | 82 | 8 | 9.76% |
| 44 | KOVR | ABC | 27 | Sacramento-Stockton | 83 | 8 | 9.64% |
| 45 | WABC | ABC | 1 | New York City | 138 | 13 | 9.42% |
| 46 | KXTV | CBS | 27 | Sacramento-Stockton | 66 | 6 | 9.09% |
| 47 | WSOC | NBC | 35 | Charlotte | 78 | 7 | 8.97% |

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[14] One need only scan the pages of the various organs of the trade press, such as *Broadcasting* magazine, *TV-Radio Age*, and so forth, to see that management personnel, on-camera talent, licensed technicians and engineers and other skilled production personnel form a finite national pool which advertises for employment (and are advertised for by the broadcasters) on a nationwide basis.

*Network affiliates ranked by percent minorities employed in high pay positions*—Continued

| Rank | Call letters | Net. aff. | Mkt. No. | Location | High pay positions | High pay Minorities employed | |
|---|---|---|---|---|---|---|---|
| | | | | | | Number | Percent |
| 48 | WCAU | CBS | 4 | Philadelphia | 56 | 5 | 8.93% |
| 49 | WFBC | NBC | 40 | Gnville-Sptbg-Ashvi | 45 | 4 | 8.89% |
| 50 | KPRC | NBC | 15 | Houston | 102 | 9 | 8.82% |
| 51 | WQXI | ABC | 17 | Atlanta | 80 | 7 | 8.75% |
| 52 | WJW | CBS | 7 | Cleveland | 115 | 10 | 8.70% |
| 53 | WPLG | ABC | 18 | Miami | 105 | 9 | 8.57% |
| 54 | WFLA | NBC | 24 | Tampa-St. Petersburg | 82 | 7 | 8.54% |
| 55 | WWJ | NBC | 5 | Detroit | 129 | 11 | 8.53% |
| 56 | WNYS | ABC | 43 | Syracuse | 48 | 4 | 8.33% |
| 57 | WBTV | CBS | 35 | Charlotte | 109 | 9 | 8.26% |
| 58 | WBBM | CBS | 3 | Chicago | 211 | 17 | 8.06% |
| 59 | KFMB | CBS | 49 | San Diego | 87 | 7 | 8.05% |
| 60 | WJBK | CBS | 5 | Detroit | 138 | 11 | 7.97% |
| 61 | WWL | CBS | 31 | New Orleans | 88 | 7 | 7.95% |
| 62 | WXYZ | ABC | 5 | Detroit | 181 | 14 | 7.73% |
| 63 | KDFW | CBS | 11 | Dallas-Fort Worth | 105 | 8 | 7.62% |
| 64 | WNAC | CBS | 6 | Boston | 132 | 10 | 7.58% |
| 65 | WAST | ABC | 37 | Albany Schenectady-T | 53 | 4 | 7.55% |
| 66 | WHNB | NBC | 22 | Hartford-New Haven | 54 | 4 | 7.41% |
| 67 | KGW | NBC | 26 | Portland | 96 | 7 | 7.29% |
| 68 | WGR | NBC | 25 | Buffalo | 55 | 4 | 7.27% |
| 69 | KBTV | ABC | 32 | Denver | 83 | 6 | 7.23% |
| 70 | WRTV | NBC | 14 | Indianapolis | 97 | 7 | 7.22% |
| 71 | WFMY | CBS | 48 | Gnsb-High Pt-Win Sal | 70 | 5 | 7.14% |
| 72 | WBRC | ABC | 38 | Birmingham | 56 | 4 | 7.14% |
| 73 | KTVK | ABC | 45 | Phoenix | 56 | 4 | 7.14% |
| 74 | KCRA | NBC | 27 | Sacramento-Stockton | 101 | 7 | 6.93% |
| 75 | WBZ | NBC | 6 | Boston | 131 | 9 | 6.87% |
| 76 | KCMO | CBS | 23 | Kansas City | 59 | 4 | 6.78% |
| 77 | WPRI | CBS | 34 | Providence | 59 | 4 | 6.78% |
| 78 | WSAZ | NBC | 33 | Charleston-Huntingto | 59 | 4 | 6.78% |
| 79 | WTIC | CBS | 22 | Hartford-New Haven | 119 | 8 | 6.72% |
| 80 | WIIC | NBC | 9 | Pittsburgh | 120 | 8 | 6.67% |
| 81 | WTMJ | NBC | 21 | Milwaukee | 105 | 7 | 6.67% |
| 82 | KWTV | CBS | 41 | Oklahoma City | 60 | 4 | 6.67% |
| 83 | WTEN | CBS | 37 | Albany-Schenectady-T | 61 | 4 | 6.56% |
| 84 | KDKA | CBS | 9 | Pittsburgh | 107 | 7 | 6.54% |
| 85 | KMOX | CBS | 12 | St. Louis | 110 | 7 | 6.36% |
| 86 | WBAP | NBC | 11 | Dallas-Fort Worth | 112 | 7 | 6.25% |
| 87 | WISH | CBS | 14 | Indianapolis | 65 | 4 | 6.25% |
| 88 | WTNH | ABC | 22 | Hartford-New Haven | 6 | 4 | .15% |
| 89 | KMBC | ABC | 23 | Kansas City | 82 | 5 | 6.10% |
| 90 | WEWS | ABC | 7 | Cleveland | 116 | 7 | 6.03% |
| 91 | KTVI | ABC | 12 | St. Louis | 83 | 5 | 6.02% |
| 92 | WMAR | CBS | 19 | Baltimore | 100 | 6 | 6.00% |
| 93 | WKBW | ABC | 25 | Buffalo | 67 | 4 | 5.97% |
| 94 | WJZ | ABC | 19 | Baltimore | 86 | 5 | 5.81% |
| 95 | KMGH | CBS | 32 | Denver | 88 | 5 | 5.68% |
| 96 | KYW | NBC | 4 | Philadelphia | 159 | 9 | 5.66% |
| 97 | WFAA | ABC | 11 | Dallas-Fort Worth | 148 | 8 | 5.41% |
| 98 | WSYR | NBC | 43 | Syracuse | 75 | 4 | 5.33% |
| 99 | KTAR | NBC | 45 | Phoenix | 75 | 4 | 5.33% |
| 100 | KIRO | CBS | 16 | Seattle-Tacoma | 94 | 5 | 5.32% |
| 101 | WLWT | NBC | 20 | Cincinnati | 134 | 7 | 5.22% |
| 102 | WSM | NBC | 30 | Nashville | 97 | 5 | 5.15% |
| 103 | WBNS | CBS | 28 | Columbus | 98 | 5 | 5.10% |
| 104 | WCCB | ABC | 35 | Charlotte | 20 | 1 | 5.00% |
| 105 | WTAE | ABC | 9 | Pittsburgh | 103 | 5 | 4.85% |
| 106 | WBEN | CBS | 25 | Buffalo | 103 | 5 | 4.85% |
| 107 | KDA | NBC | 32 | Denver | 66 | 3 | 4.55% |
| 108 | WSPD | NBC | 45 | Toledo | 67 | 3 | 4.48% |
| 109 | WHEN | CBS | 43 | Syracuse | 45 | 2 | 4.44% |
| 110 | WITI | ABC | 21 | Milwaukee | 95 | 4 | 4.21% |
| 111 | WZZM | ABC | 41 | Kalamazoo-Gr Rapids | 48 | 2 | 4.17% |
| 112 | WXII | NBC | 48 | Gnsb-High Pt-Win Sal | 73 | 3 | 4.11% |
| 113 | WAVE | NBC | 36 | Louisville | 76 | 3 | 3.95% |
| 114 | WLAC | CBS | 30 | Nashville | 76 | 3 | 3.95% |
| 115 | WDAF | NBC | 23 | Kansas City | 51 | 2 | 3.92% |
| 116 | WCPO | CBS | 20 | Cincinnati | 103 | 4 | 3.88% |
| 117 | KOIN | CBS | 26 | Portland | 78 | 3 | 3.85% |
| 118 | WJAR | NBC | 34 | Providence | 78 | 3 | 3.85% |
| 119 | KATU | ABC | 26 | Portland | 79 | 3 | 3.80% |
| 120 | KOMO | ABC | 16 | Seattle-Tacoma | 132 | 5 | 3.79% |
| 121 | WHAS | CBS | 36 | Louisville | 83 | 3 | 3.61% |
| 122 | WOIV | NBC | 41 | Kalamazoo-Gr Rapids | 83 | 3 | 3.61% |

*Network affiliates ranked by percent minorities employed in high pay positions*—Continued

| Rank | Call letters | Net. aff. | Mkt. No. | Location | High pay positions | High pay Minorities employed | |
|---|---|---|---|---|---|---|---|
| | | | | | | Number | Percent |
| 123 | WTEV | ABC | 34 | Providence | 56 | 2 | 3.57% |
| 124 | KOPX | ABC | 50 | Salt Lake City | 58 | 2 | 3.45% |
| 125 | WTOL | CBS | 45 | Toledo | 59 | 2 | 3.39% |
| 126 | WDSU | NBC | 31 | New Orleans | 89 | 3 | 3.37% |
| 127 | WKY | NBC | 41 | Oklahoma City | 90 | 3 | 3.33% |
| 128 | WTVT | CBS | 24 | Tampa-St. Petersburg | 92 | 3 | 3.26% |
| 129 | WDHO | ABC | 45 | Toledo | 33 | 1 | 3.03% |
| 130 | WLKY | ABC | 36 | Louisville | 37 | 1 | 2.70% |
| 131 | WLWD | NBC | 39 | Dayton | 75 | 2 | 2.67% |
| 132 | WAPI | NBC | 38 | Birmingham | 40 | 1 | 2.50% |
| 133 | WCHS | CBS | 33 | Charleston-Huntington | 44 | 1 | 2.27% |
| 134 | KSD | NBC | 12 | St. Louis | 94 | 2 | 2.13% |
| 135 | WVFC | ABC | 44 | Norf-Newp News-Hamp | 47 | 1 | 2.13% |
| 136 | WLCY | ABC | 24 | Tampa-St. Petersburg | 52 | 1 | 1.92% |
| 137 | WCCO | CBS | 13 | Minneapolis-St Paul | 162 | 3 | 1.85% |
| 138 | KSTP | NBC | 13 | Minneapolis-St Paul | 119 | 2 | 1.68% |
| 139 | WLWI | ABC | 14 | Indianapolis | 66 | 1 | 1.52% |
| 140 | WISN | CBS | 21 | Milwaukee | 78 | 1 | 1.28% |
| 141 | KSL | CBS | 50 | Salt Lake City | 101 | 1 | 0.99% |
| 142 | WSPA | CBS | 40 | Gnville-Sptnbg-Ashvi | 45 | 0 | 0.0% |
| 143 | WRGB | NBC | 37 | Albany-Schenectady-T | 64 | 0 | 0.0% |
| 144 | KUTV | NBC | 50 | Salt Lake City | 62 | 0 | 0.0% |
| 145 | WHTN | ABC | 33 | Charleston-Huntington | 36 | 0 | 0.0% |
| 146 | KMSP | ABC | 13 | Minneapolis-St Paul | 48 | 0 | 0.0% |
| 147 | WKZO | CBS | 41 | Kalamazoo-Gr Rapids | 51 | 0 | 0.0% |

## III. ANALYSIS OF FEMALE EMPLOYMENT

Women comprised approximately 22.1% of the employees at the 147 stations in our study, but only 6.4% of the employees in the five high-paying categories discussed in the previous section. That tremendous disparity points up an urgent need for affirmative action programs designed to get more women into the high-paying, decisionmaking end of broadcasting. In Table 10, therefore, we rank the network affiliates on the percentage of women employed in those five categories.

*Network Affiliates Ranked by Percent Women Employed in High Pay Positions*

| Rank | Call letters | Net. aff. | Mkt. No. | Location | High pay positions | High pay women employed | |
|---|---|---|---|---|---|---|---|
| | | | | | | Number | Percent |
| 1 | WCAU | CBS | 4 | Philadelphia | 56 | 14 | 25.00% |
| 2 | WMAL | ABC | 10 | Washington D.C | 128 | 21 | 16.41% |
| 3 | WTOP | CBS | 10 | Washington D.C | 111 | 15 | 13.51% |
| 4 | WLKY | ABC | 36 | Louisville | 37 | 5 | 13.51% |
| 5 | KMBC | ABC | 23 | Kansas City | 82 | 11 | 13.41% |
| 6 | KABC | ABC | 2 | Los Angeles | 162 | 21 | 12.96% |
| 7 | WGHP | ABC | 48 | Gnsb-High Pt-Win Sal | 57 | 7 | 12.28% |
| 8 | WLWI | ABC | 14 | Indianapolis | 66 | 8 | 12.12% |
| 9 | WSIX | ABC | 30 | Nashville | 58 | 7 | 12.07% |
| 10 | KOMO | ABC | 16 | Seattle-Tacoma | 132 | 15 | 11.36% |
| 11 | WAST | ABC | 37 | Albany-Schenectady-T | 53 | 6 | 11.32% |
| 12 | WHTN | ABC | 33 | Charleston-Huntingto | 36 | 4 | 11.11% |
| 13 | WCBS | CBS | 1 | New York City | 181 | 20 | 11.05% |
| 14 | WTVJ | CBS | 18 | Miami | 127 | 14 | 11.02% |
| 15 | WVUE | ABC | 31 | New Orleans | 74 | 8 | 10.81% |
| 16 | KTVK | ABC | 45 | Phoenix | 56 | 6 | 10.71% |
| 17 | WNBC | NBC | 1 | New York City | 179 | 19 | 10.61% |
| 18 | WXYZ | ABC | 5 | Detroit | 181 | 19 | 10.50% |
| 19 | WPLG | ABC | 18 | Miami | 105 | 11 | 10.48% |
| 20 | WTOL | CBS | 45 | Toledo | 59 | 6 | 10.17% |
| 21 | WCCB | ABC | 35 | Charlotte | 20 | 2 | 10.00% |
| 22 | WIIC | NBC | 9 | Pittsburgh | 120 | 12 | 10.00% |
| 23 | WCXI | ABC | 17 | Atlanta | 80 | 8 | 10.00% |

*Network Affiliates Ranked by Percent Women Employed in High Pay Positions*—**Continued**

| Rank | Call letters | Net. aff. | Mkt. No. | Location | High pay positions | High pay women employed | |
|---|---|---|---|---|---|---|---|
| | | | | | | Number | Percent |
| 24 | WBZ | NBC | 6 | Boston | 131 | 13 | 9.92% |
| 25 | WLS | ABC | 3 | Chicago | 224 | 22 | 9.82% |
| 26 | WXII | NBC | 48 | Gnsb-High Pt-Win Sal | 73 | 7 | 9.59% |
| 27 | WLWC | NBC | 28 | Columbus | 73 | 7 | 9.59% |
| 28 | WISH | CBS | 14 | Indianapolis | 64 | 6 | 9.38% |
| 29 | WCCO | CBS | 13 | Minneapolis-St Paul | 162 | 15 | 9.26% |
| 30 | KBMS | CBS | 49 | San Diego | 87 | 8 | 9.20% |
| 31 | WOHO | ABC | 45 | Toledo | 33 | 3 | 9.09% |
| 32 | Knox | CBS | 12 | St. Louis | 110 | 10 | 9.09% |
| 33 | WBBM | CBS | 3 | Chicago | 211 | 19 | 9.00% |
| 34 | KGO | ABC | 8 | San Francisco | 189 | 17 | 8.99% |
| 35 | KING | NBC | 16 | Seattle-Tacoma | 112 | 10 | 8.93% |
| 36 | WFBC | NBC | 40 | Gnville-Sptnbg-Ashvi | 45 | 4 | 8.89% |
| 37 | WFAA | ABC | 11 | Dallas-Fort Worth | 148 | 13 | 8.78% |
| 38 | KNBC | NBC | 2 | Los Angeles | 174 | 15 | 8.62% |
| 39 | WTAR | CBS | 44 | Norf-Newp News-Hamp | 82 | 7 | 8.54% |
| 40 | WVEC | ABC | 44 | Norf-Newp News-Hamp | 47 | 4 | 8.51% |
| 41 | WMAO | NBC | 3 | Chicago | 236 | 20 | 8.47% |
| 42 | WTIC | CBS | 22 | Hartford-New Haven | 119 | 10 | 8.40% |
| 43 | KMSP | ABC | 13 | Minneapolis-St Paul | 48 | 4 | 8.33% |
| 44 | WRTV | NBC | 14 | Indianapolis | 97 | 8 | 8.25% |
| 45 | WBNS | CBS | 28 | Columbus | 98 | 8 | 8.16% |
| 46 | WTVN | ABC | 28 | Columbus | 62 | 5 | 8.06% |
| 47 | WCKT | NBC | 18 | Miami | 102 | 8 | 7.84% |
| 48 | KSAT | ABC | 45 | San Antonio | 64 | 5 | 7.81% |
| 49 | KDFW | CBS | 11 | Dallas-Fort Worth | 105 | 8 | 7.62% |
| 50 | KXTV | CBS | 27 | Sacramento-Stockton | 66 | 5 | 7.58% |
| 51 | WPVI | ABC | 4 | Philadelphia | 121 | 9 | 7.44% |
| 52 | WPTV | CBS | 35 | Charlotte | 109 | 8 | 7.34% |
| 53 | KPIX | CBS | 8 | San Francisco | 110 | 8 | 7.27% |
| 54 | WSM | NBC | 30 | Nashville | 97 | 7 | 7.22% |
| 55 | WBRC | ABC | 38 | Birmingham | 56 | 4 | 7.14% |
| 56 | WBAL | NBC | 19 | Baltimore | 114 | 8 | 7.02% |
| 57 | WJZ | ABC | 19 | Baltimore | 86 | 6 | 6.98% |
| 58 | WAVY | NBC | 44 | Norf-Newp News-Hamp | 58 | 4 | 6.90% |
| 59 | WLOS | ABC | 40 | Gnville-Sptnbg-Ashvi | 58 | 4 | 6.90% |
| 60 | WCHS | CBS | 33 | Charleston-Huntingto | 44 | 3 | 6.82% |
| 61 | KWTV | CBS | 41 | Oklahoma City | 60 | 4 | 6.67% |
| 62 | KTAR | NBC | 45 | Phoenix | 75 | 5 | 6.67% |
| 63 | KRON | NBC | 8 | San Francisco | 165 | 11 | 6.67% |
| 64 | WHEN | CBS | 43 | Syracuse | 45 | 3 | 6.67% |
| 65 | WABC | ABC | 1 | New York City | 138 | 9 | 6.52% |
| 66 | WRC | NBC | 10 | Washington, D.C | 170 | 11 | 6.47% |
| 67 | WKYC | NBC | 7 | Cleveland | 155 | 10 | 6.45% |
| 68 | KATU | ABC | 26 | Portland | 79 | 5 | 6.33% |
| 69 | WITI | ABC | 21 | Milwaukee | 95 | 6 | 6.32% |
| 70 | KYW | NBC | 4 | Philadelphia | 159 | 10 | 6.29% |
| 71 | KOA | NBC | 32 | Denver | 66 | 4 | 6.06% |
| 72 | KNXT | CBS | 2 | Los Angeles | 253 | 15 | 5.93% |
| 73 | KSTP | NBC | 13 | Minneapolis-St. Paul | 119 | 7 | 5.88% |
| 74 | WSB | NBC | 17 | Atlanta | 104 | 6 | 5.77% |
| 75 | WFMY | CBS | 48 | Gnsb-High Pt-Win Sal | 70 | 4 | 5.71% |
| 76 | WTMJ | NBC | 21 | Milwaukee | 105 | 6 | 5.71% |
| 77 | WDSU | NBC | 31 | New Orleans | 89 | 5 | 5.62% |
| 78 | WHNB | NBC | 22 | Hartford-New Haven | 54 | 3 | 5.56% |
| 79 | WGR | NBC | 25 | Buffalo | 55 | 3 | 5.45% |
| 80 | WTEV | ABC | 34 | Providence | 56 | 3 | 5.36% |
| 81 | WLWD | NBC | 39 | Dayton | 75 | 4 | 5.33% |
| 82 | KHOU | CBS | 15 | Houston | 75 | 4 | 5.33% |
| 83 | KSD | NBC | 12 | St. Louis | 94 | 5 | 5.32% |
| 84 | KENS | CBS | 45 | San Antonio | 57 | 3 | 5.26% |
| 85 | WLAC | CBS | 30 | Nashville | 76 | 4 | 5.26% |
| 86 | WKRC | ABC | 20 | Cincinnati | 57 | 3 | 5.26% |
| 87 | WLWT | NBC | 20 | Cincinnati | 134 | 7 | 5.22% |
| 88 | KGW | NBC | 26 | Portland | 96 | 5 | 5.21% |
| 89 | KOIN | CBS | 26 | Portland | 78 | 4 | 5.13% |
| 90 | WISN | CBS | 21 | Milwaukee | 78 | 4 | 5.13% |
| 91 | WPRI | CBS | 34 | Providence | 59 | 3 | 5.08% |
| 92 | WOAI | NBC | 45 | San Antonio | 60 | 3 | 5.00% |
| 93 | WTAE | ABC | 9 | Pittsburgh | 103 | 5 | 4.85% |
| 94 | KUTV | NBC | 50 | Salt Lake City | 62 | 3 | 4.84% |
| 95 | KBTV | ABC | 32 | Denver | 83 | 4 | 4.82% |
| 96 | WMC | NBC | 29 | Memphis | 64 | 3 | 4.69% |
| 97 | WRGB | NBC | 37 | Albany-Schenectady-T | 64 | 3 | 4.69% |
| 98 | KMGH | CBS | 32 | Denver | 88 | 4 | 4.55% |
| 99 | WWL | CBS | 31 | New Orleans | 88 | 4 | 4.55% |
| 100 | WBAP | NBC | 11 | Dallas-Fort Worth | 112 | 5 | 4.46% |

***Network Affiliates Ranked by Percent Women Employed in High Pay Positions*—Continued**

| Rank | Call letters | Net. aff. | Mkt. No. | Location | High pay positions | High pay women employed | |
|---|---|---|---|---|---|---|---|
| | | | | | | Number | Percent |
| 101 | WSPA | CBS | 40 | Gnville-Sptnbg-Ashvi | 45 | 2 | 4.44% |
| 102 | WNYS | ABC | 43 | Syracuse | 48 | 2 | 4.17% |
| 103 | WBMG | CBS | 38 | Birmingham | 24 | 1 | 4.17% |
| 104 | KGTV | NBC | 49 | San Diego | 98 | 4 | 4.08% |
| 105 | WMAR | CBS | 19 | Baltimore | 100 | 4 | 4.00% |
| 106 | KTRK | ABC | 15 | Houston | 75 | 3 | 4.00% |
| 107 | KPRC | NBC | 15 | Houston | 102 | 4 | 3.92% |
| 108 | WCPO | CBS | 20 | Cincinnati | 103 | 4 | 3.88% |
| 109 | WWJ | NBC | 5 | Detroit | 129 | 5 | 3.88% |
| 110 | WSOC | NBC | 35 | Charlotte | 78 | 3 | 3.85% |
| 111 | WREC | CBS | 29 | Memphis | 52 | 2 | 3.85% |
| 112 | WNAC | CBS | 6 | Boston | 132 | 5 | 3.79% |
| 113 | WFLA | NBC | 24 | Tampa-St. Petersburg | 82 | 3 | 3.66% |
| 114 | WHIO | CBS | 39 | Dayton | 82 | 3 | 3.66% |
| 115 | KOOL | CBS | 45 | Phoenix | 83 | 3 | 3.61% |
| 116 | KCPX | ABC | 50 | Salt Lake City | 58 | 2 | 3.45% |
| 117 | KOCO | ABC | 41 | Oklahoma City | 59 | 2 | 3.39% |
| 118 | WKY | NBC | 41 | Oklahoma City | 90 | 3 | 3.33% |
| 119 | WHBQ | ABC | 29 | Memphis | 61 | 2 | 3.28% |
| 120 | WTEN | CBS | 37 | Albany-Schenectady-T | 61 | 2 | 3.28% |
| 121 | WTVT | CBS | 24 | Tampa-St. Petersburg | 92 | 3 | 3.26% |
| 122 | KIRO | CBS | 16 | Seattle-Tacoma | 94 | 3 | 3.19% |
| 123 | WKBW | ABC | 25 | Buffalo | 67 | 2 | 2.99% |
| 124 | KCRA | NBC | 27 | Sacramento-Stockton | 101 | 3 | 2.97% |
| 125 | KDKA | CBS | 9 | Pittsburgh | 107 | 3 | 2.80% |
| 126 | WAGA | CBS | 17 | Atlanta | 109 | 3 | 2.75% |
| 127 | WAVE | NBC | 36 | Louisville | 76 | 2 | 2.63% |
| 128 | WJW | CBS | 7 | Cleveland | 115 | 3 | 2.61% |
| 129 | WAPI | NBC | 38 | Birmingham | 40 | 1 | 2.50% |
| 130 | WHAS | CBS | 36 | Louisville | 83 | 2 | 2.41% |
| 131 | KOVR | ABC | 27 | Sacramento-Stockton | 83 | 2 | 2.41% |
| 132 | WJBK | CBS | 5 | Detroit | 138 | 3 | 2.17% |
| 133 | WZZM | ABC | 41 | Kalamazoo-Gr Rapids | 48 | 1 | 2.08% |
| 134 | WKZO | CBS | 41 | Kalamazoo-Gr Rapids | 51 | 1 | 1.96% |
| 135 | WDAF | NBC | 23 | Kansas City | 51 | 1 | 1.96% |
| 136 | WBEN | CBS | 25 | Buffalo | 103 | 2 | 1.94% |
| 137 | WLCY | ABC | 24 | Tampa-St. Petersburg | 52 | 1 | 1.92% |
| 138 | WEWS | ABC | 7 | Cleveland | 116 | 2 | 1.72% |
| 139 | WSAZ | NBC | 33 | Charleston-Huntingto | 59 | 1 | 1.69% |
| 140 | KCMO | CBS | 23 | Kansas City | 59 | 1 | 1.69% |
| 141 | WINH | ABC | 22 | Hartford-New Haven | 65 | 1 | 1.54% |
| 142 | WSPD | NBC | 45 | Toledo | 67 | 1 | 1.49% |
| 143 | WSYR | NBC | 43 | Syracuse | 75 | 1 | 1.33% |
| 144 | WJAR | NBC | 34 | Providence | 78 | 1 | 1.28% |
| 145 | WOTV | NBC | 41 | Kalamazoo-Gr Rapids | 83 | 1 | 1.20% |
| 146 | KTVI | ABC | 12 | St. Louis | 83 | 1 | 1.20% |
| 147 | KSL | CBS | 50 | Salt Lake City | 101 | 0 | 0.0% |

## IV. REMEDIES FOR CLAIMS OF EMPLOYMENT DISCRIMINATION

Claims of employment discrimination against any television station may be filed with both the FCC and the Equal Employment Opportunity Commission (EEOC).

The claim can be filed with the FCC by any individual or interested community group if there is reason to believe that an employee has been discriminated against on the basis of race, color, national origin, or sex. Any claim of discrimination filed with the FCC should allege—and demonstrate, to the extent possible—that the broadcaster is in violation of his public interest responsibility to engage in fair employment practices, and that he has failed to comply with the FCC's equal employment rules.[15] The FCC's action on a discrimination claim it considers legitimate will be geared toward bringing the broadcaster into compliance with those rules, and a complaint before the FCC is thus brought on behalf of the Commission rather than the individual or group against whom the discrimination is alleged.

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[15] 47 C.F.R. § 73.680.

If an employee or group merely wishes to bring a claim of discrimination to the attention of the FCC, without further pursuing the matter, it may write a letter of complaint to the FCC, stating the particulars of the claim against the station. The FCC will review the complaint in much the same manner as it might review a complaint based on a violation of the fairness doctrine or another type of programming violation and may request a response from the broadcaster. At the very least, the complaint is placed in the station's complaint file for review when its license comes up for renewal. If the complaints division finds that the complaint at issue is significant enough, it will forward the complaint to the renewal branch at the appropriate time.[16]

A fuller remedy at the FCC might be pursued in the form of a petition to deny the station's license renewal.[17] The petition may assert discrimination against particular employees or it may cite a general trend or pattern of employment discrimination, both of which are a violation of the FCC's equal employment rules. The petition to deny provides a remedy separate from the Commission's independent inquiry into a complaint about the station's equal employment practices. It *requires* the Commission to confront the issue directly, and is therefore somewhat more likely to result in further inquiry by the Commission, a fine under Section 503 of the Communications Act,[18] or the outright denial of renewal of the broadcaster's license; at the very least, the issues involved will be given a fuller airing than they might receive if the complaint merely takes the form of a letter of information to the FCC.

Unlike a claim of employment discrimination filed at the FCC, a charge of discrimination filed with the EEOC is aimed at providing relief to the individual employee who feels he has been discriminated against. The following is but an abbreviated description of the process to be followed at the EEOC. More information can be acquired by writing or calling:

U.S. Equal Employment Opportunity Commission
1800 G Street, N.W.
Washington, D.C. 20506
or
District or Regional Offices of the EEOC
(listed in local telephone directories under U.S. Government)

Title VII of the 1964 Civil Rights Act, which created the EEOC forbids discrimination in hiring, upgrading and all other conditions of employment, where the discrimination is based upon race, color, religion, sex or national origin.[19] Title VII, as amended, covers all employers with 15 or more employees, so all the television stations in this survey (and all other television stations as well) should be required to comply with its provisions.

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[16] Unfortunately, time and the renewal process have proven that what citizens would consider significant and what the FCC would consider significant are often leagues apart in areas like employment.

[17] See the procedures described in greater detail in Chapter 4 of this Report.

[18] 47 U.S.C. § 503(b)(1) provides for a forfeiture of up to $1000 per violation, up to a limit of $10.000, against any licensee who "willfully or repeatedly fails to observe any of the provisions of this Act or any rule or regulation of the Commission. . . ."

[19] 42 U.S.C. § 2000 e–2 (1964).

A person who believes that he or she is a victim of discrimination by a broadcast employer may file a complaint with the EEOC at the above address. A complaint may also be filed by an individual or a group *on behalf of* any individual who may have suffered discrimination.

An individual who feels he or she cannot file a charge because of a need to remain anonymous may write one of the EEOC's five Commissioners in Washington, D.C., requesting the filing of a Commissioner's Charge, and setting forth the facts which warrant the filing of such a charge. The individual Commissioner may, at his or her discretion, proceed to file a charge, permitting the complaint to remain anonymous.

It is important that an individual file the charge as soon as possible after the discrimination takes place. In most cases the charge must be filed within 180 days of the discrimination complained of if the EEOC is to have jurisdiction of the matter.

When the EEOC receives the charge, a representative reviews the facts and contacts the complainant. If the charge is one which can be handled by the EEOC, an investigator gathers all the facts from the complainant and from the parties charged with discrimination. The EEOC is required by law to furnish a copy of the charge to the parties charged with discrimination.

If the EEOC does not find that the facts support the complainant's charge, the complainant and the parties charged with discrimination are notified that the charge has been dismissed.

If the EEOC finds reasonable cause to believe that the individual has been discriminated against, it then attempts to conciliate and reach an agreement satisfactory to all parties involved. Before the passage of the Equal Employment Opportunity Act of 1972, the EEOC was limited to this process of conciliation in seeking a resolution of the charge. Now, if the EEOC cannot reach a settlement agreeable to all parties, the Commission may go to a United States District Court to obtain an order prohibiting the discrimination.[20]

The person filing the complaint is also entitled to request notification of his or her own right to file a suit if the EEOC cannot reach a settlement or if the EEOC does not take the case to court within 180 days after the complaint is filed.

In some instances, however, the EEOC may not act directly on the charge until state remedies are sought. If the individual bringing the charge lives in a state or locality which enforces its own fair employment practices law, the EEOC must initially send the case to the state or local agency for investigation and notify the individual that it has done so. After a minimum of 60 days have passed, the EEOC automatically reactivates the charge, unless it has already been settled to the satisfaction of the individual bringing the charge by the state or local agency.

Finally, an individual charging discrimination should remember that it is illegal for anyone to penalize or retaliate against the individual in any way. In the event any attempt is made to penalize or retaliate against a person in any way for filing a charge with the EEOC, the EEOC should be notified immediately.

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[20] —— U.S.C. —— (1972 Supp.).

For further information about this avenue of relief, you should acquire, in addition to the United Church of Christ materials described in Chapter 4, the EEOC pamphlets ***Facts about Title VII of the Civil Rights Act of 1964*** and ***Toward Job Equality for Women***, from the EEOC's Washington office.

### V. NATIONAL EMPLOYMENT ANALYSIS

### *A. Total Employment*

The 147 television stations included in this study, the major network affiliates in the nation's top 50 television markets, reported 17,641 full-time employees in 1971 and 17,737 in 1972, an increase of 96, or 0.5%. Employment of minority group employees among full-time employees at the 147 stations was 1,759 (10.0%) in 1971 and 2,043 (11.5%) in 1972. Women were employed in 3,893 of the full-time positions (22.1%) in 1971 and 3,926 (22.1%) in 1972.

TABLE 11.—*Total Full-time Employment—147 Stations—1972*

| | | | |
|---|---|---|---|
| Total employees | 17,641 (100%) | 17,737 (100%) | +96 (+0.5%) |
| Minority employees | 1,759 (10.0%) | 2,043 (11.5%) | +284 (+16.1%) |
| Women employees | 3,893 (22.1%) | 3,926 (22.1%) | +33 (22.1%) |

Of the 147 stations, the following 19 reported fewer than five minority employees:

TABLE 12.—*Fewer Than Five Minority Employees—1972*

| Call letters | Channel # | Location | Market # | Number of minority employees |
|---|---|---|---|---|
| KSTP | 5 | Minneapolis/St. Paul | 13 | 3 |
| KMSP | 9 | Minneapolis/St. Paul | 13 | 0 |
| WISN | 12 | Milwaukee | 21 | 4 |
| WLCY | 10 | Tampa/St. Petersburg | 24 | 3 |
| KOA | 4 | Denver | 32 | 4 |
| WHTN | 13 | Charleston/Huntington | 33 | 4 |
| WCHS | 8 | Charleston/Huntington | 33 | 4 |
| WJAR | 10 | Providence | 34 | 3 |
| WCCB | 18 | Charlotte | 35 | 2 |
| WLKY | 32 | Louisville | 36 | 4 |
| WAST | 13 | Albany/Schenectady/Troy | 37 | 4 |
| WTEN | 10 | Albany/Schenectady/Troy | 37 | 4 |
| WRGB | 6 | Albany/Schenectady/Troy | 37 | 1 |
| WAPI | 13 | Birmingham | 38 | 4 |
| WKZO | 3 | Grand Rapids/Kalamazoo | 41 | 0 |
| WDHO | 24 | Toledo | 45 | 1 |
| KCPX | 4 | Salt Lake City | 50 | 3 |
| KUTV | 2 | Salt Lake City | 50 | 1 |
| KSL | 5 | Salt Lake City | 50 | 1 |

### *B. High Pay Positions*

Of the nine job positions in the annual employment report, five have substantially higher pay scales than the rest. They are: officials and managers, professionals, technicians, sales workers, and craftsmen. In 1972, the 147 stations reported 13,448 full-time workers in the upper five job categories. This represents about 75.8% of all the full-time employees at the 147 stations.

Minority employees comprised 9.2% (1,241 jobs) of the stations' full-time positions in the upper five job categories in 1972 (compared with 11.5% of the total station work force), and women held 866 jobs, comprising 6.4% (compared with 22.1% of the total station work force). In short, comparing the differential between high pay and total jobs, women are *more* discriminated against by broadcasters within their organizations than minorities.

TABLE 13.—*Total Minorities and Women in High Pay Positions—1972*

| | 1972 number | Percentage |
|---|---|---|
| Total full-time | 13,448 | 100% |
| Minorities full-time | 1,241 | 9.2% |
| Women full-time | 866 | 6.4% |

Of the 147 stations, the following 16 (10.9%) reported employing one or no minorities in the upper five job categories in 1972:

TABLE 14a.—*Stations Employing 0 or 1 Minorities in High Pay Positions—1972*

| Call ltrs. | Location | Ch. # | Mkt. # | Total high-pay employees | Minority high-pay employees |
|---|---|---|---|---|---|
| WKZO | Grand Rapids/Kalamazoo | 3 | 41 | 51 | 0 |
| KMSP | Minneapolis/St. Paul | 9 | 13 | 48 | 0 |
| KSL | Salt Lake City | 5 | 50 | 101 | 1 |
| KUTV | Salt Lake City | 2 | 50 | 62 | 0 |
| WRGB | Albany/Schenectady/Troy | 6 | 37 | 64 | 0 |
| WDHO | Toledo | 24 | 45 | 33 | 1 |
| WISN | Milwaukee | 12 | 21 | 78 | 1 |
| WLCY | Tampa/St. Petersburg | 10 | 24 | 52 | 1 |
| WVEC | Norfolk/Newport News | 13 | 44 | 47 | 1 |
| WAPI | Birmingham | 13 | 38 | 52 | 1 |
| WLKY | Louisville | 32 | 36 | 37 | 1 |
| WCHS | Charleston/Huntington | 8 | 33 | 44 | 1 |
| WHTN | Charleston/Huntington | 13 | 33 | 36 | 0 |
| WSPA | Greenville/Sptnburg/Asheville | 7 | 40 | 45 | 0 |
| WCCB | Charlotte | 18 | 35 | 20 | 1 |
| WLWI | Indianapolis | 13 | 14 | 66 | 1 |

Of the 147 stations, the following 17 (11.6%) reported employing one or no women in the upper five job categories in 1972:

TABLE 14-b.—*Stations Employing 0 or 1 Women in High Pay Positions—1972*

| Call ltrs. | Location | Ch. # | Mkt. # | Total high-pay employees | Minority high-pay employees |
|---|---|---|---|---|---|
| KSL | Salt Lake City | 5 | 50 | 101 | 0 |
| WOTV | Grand Rapids/Kalamazoo | 8 | 41 | 83 | 1 |
| KTVI | St. Louis | 2 | 12 | 83 | 1 |
| WJAR | Providence | 10 | 34 | 78 | 1 |
| WSPD | Toledo | 13 | 45 | 67 | 1 |
| WTNH | Hartford/New Haven | 8 | 22 | 65 | 1 |
| KCMO | Kansas City | 5 | 23 | 59 | 1 |
| WSAZ | Charleston/Huntington | 3 | 33 | 59 | 1 |
| WLCY | Tampa/St. Petersburg | 10 | 24 | 52 | 1 |
| WKZO | Grand Rapids/Kalamazoo | 3 | 41 | 51 | 1 |
| WDAF | Kansas City | 4 | 23 | 51 | 1 |
| WSYR | Syracuse | 3 | 43 | 75 | 1 |
| WZZM | Grand Rapids/Kalamazoo | 13 | 41 | 48 | 1 |
| KUTV | Salt Lake City | 2 | 50 | 62 | 1 |
| WREC | Memphis | 3 | 29 | 52 | 1 |
| WAPI | Birmingham | 13 | 38 | 40 | 1 |
| WBMG | Birmingham | 42 | 38 | 24 | 1 |

It should be especially noted that there are double offenders among the ranks of these, the most egregious of high-pay discriminators. Stations KSL, Salt Lake City, KUTV, Salt Lake City, WLCY, Tampa-St. Petersburg, WKZO, Grand Rapids-Kalamazoo and WAPI, Birmingham report a combined total of some 306 high-pay positions, but employ a total of just three minorities and four women in those positions.

### *C. Increase or decrease of minority and female employment from 1971 to 1972*

100 stations (68%) reported an increase in the number of full-time minority group employees in 1972 over 1971; 47 (32%) reported a decrease or remained the same. 67 stations (46%) reported an increase in the number of full-time women employees in 1972 over 1971; 80 (54%) reported a decrease or remained the same. Once again, by this measure, we see that more efforts are being made to improve the employment picture for minorities than for women.

The following 64 stations reported *decreases* in employment of minorities, or women, or both:

TABLE 15.—*Stations Showing Decrease in Employment of Minorities or Women—1972*[21]

| Call ltrs. | Location | Ch.# | Mkt.# | M=minorities W=women |
|---|---|---|---|---|
| WCBS | New York City | 2 | 1 | W |
| KNXT | Los Angeles | 2 | 2 | W |
| WPVI | Philadelphia | 6 | 4 | W |
| WCAU | Philadelphia | 10 | 4 | W |
| WJBK | Detroit | 2 | 5 | M, W |
| WWJ | Detroit | 4 | 5 | W |
| WNAC | Boston | 7 | 6 | M, W |
| WJW | Cleveland | 8 | 7 | W |
| WRC | Washington, D.C | 4 | 10 | W |
| WMAL | Washington, D.C | 7 | 10 | W |
| WBAP | Dallas/Ft. Worth | 5 | 11 | W |
| KMOX | St. Louis | 4 | 12 | W |
| KTVI | St. Louis | 2 | 12 | W |
| WCCO | Minneapolis/St. Paul | 4 | 13 | M |
| KSTP | Minneapolis/St. Paul | 5 | 13 | M, W |
| KMSP | Minneapolis/St. Paul | 9 | 13 | M |
| WRTV | Indianapolis | 6 | 14 | M, W |
| KTRK | Houston | 13 | 15 | W |
| KOMO | Seattle/Tacoma | 4 | 16 | W |
| KIRO | Seattle/Tacoma | 7 | 16 | W |
| WAGA | Atlanta | 5 | 17 | M, W |
| WKRC | Cincinnati | 12 | 20 | M, W |
| WCPO | Cincinnati | 9 | 20 | W |
| WTMJ | Milwaukee | 4 | 21 | M, W |
| WITI | Milwaukee | 6 | 21 | W |
| WTNH | Hartford/New Haven | 8 | 22 | M, W |
| WHNB | Hartford/New Haven | 30 | 22 | W |
| WDAF | Kansas City | 4 | 23 | W |
| KMBC | Kansas City | 9 | 23 | M |
| KCMO | Kansas City | 5 | 23 | W |
| WLCY | Tampa/St. Petersburg | 10 | 24 | W |
| WFLA | Tampa/St. Petersburg | 8 | 24 | W |
| WGR | Buffalo | 2 | 25 | W |
| KOIN | Portland | 6 | 26 | W |
| WBNS | Columbus | 10 | 28 | M, W |
| WTVN | Columbus | 6 | 28 | W |
| WLWC | Columbus | 4 | 28 | W |
| WSM | Nashville | 4 | 30 | M |
| WWL | New Orleans | 4 | 31 | W |
| KOA | Denver | 4 | 32 | M |
| KMBH | Denver | 7 | 32 | M |
| KBTV | Denver | 9 | 32 | M, W |
| WPRI | Providence | 12 | 34 | W |

TABLE 15.—***Stations Showing Decrease in Employment of Minorities***—**Continued**

| Call ltrs. | Location | Ch. # | Mkt. # | M=minorities W=women |
|---|---|---|---|---|
| KSL | Salt Lake City | 5 | 50 | M, W |
| WCCB | Charlotte | 18 | 35 | M |
| WHAS | Louisville | 11 | 36 | M, W |
| WLKY | Louisville | 32 | 36 | W |
| WAVE | Louisville | 3 | 36 | W |
| WAPI | Birmingham | 13 | 38 | M |
| WHIO | Dayton | 7 | 39 | W |
| WLOS | Greenville/Spartanburg/Asheville | 13 | 40 | W |
| KOCO | Oklahoma City | 5 | 41 | W |
| WKY | Oklahoma City | 4 | 41 | W |
| WZZM | Grand Rapids/Kalamazoo | 13 | 41 | M, W |
| WOTV | Grand Rapids/Kalamazoo | 8 | 41 | M, W |
| WVEC | Norfolk/Newport News | 13 | 44 | M |
| KOOL | Phoenix | 10 | 45 | W |
| KTVK | Phoenix | 3 | 45 | M |
| WOAI | San Antonio | 4 | 45 | M |
| WTOL | Toledo | 11 | 45 | W |
| WDHO | Toledo | 24 | 45 | M, W |
| WSPD | Toledo | 13 | 45 | W |
| WFMY | Greensboro/Winston Salem/High Point | 2 | 48 | W |
| KUTV | Salt Lake City | 2 | 50 | M, W |

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[21] It should be noted, however, that certain of these stations are *relatively speaking* among the very best in our employment rankings. WCAU, for example, ranks Number 1 in employment of women in high pay positions, even though it experienced a decline.

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SECTION IV - FULL-TIME PAID EMPLOYEES (applicable to all respondents)

| JOB CATEGORIES[1] | ALL EMPLOYEES[2] | | | MINORITY GROUP EMPLOYEES | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | MALE | | | | FEMALE | | | |
| | Total (Col. 2+3) (1) | Male (2) | Female (3) | Negro (4) | Oriental (5) | American Indian[3] (6) | Spanish Surnamed American (7) | Negro (8) | Oriental (9) | American Indian (10) | Spanish Surnamed American (11) |
| Officials and managers | | | | | | | | | | | |
| Professionals | | | | | | | | | | | |
| Technicians | | | | | | | | | | | |
| Sales workers | | | | | | | | | | | |
| Office and clerical | | | | | | | | | | | |
| Craftsmen (Skilled) | | | | | | | | | | | |
| Operatives (Semi-skilled) | | | | | | | | | | | |
| Laborers (Unskilled) | | | | | | | | | | | |
| Service workers | | | | | | | | | | | |
| TOTAL | | | | | | | | | | | |
| Total employment from previous report (if any) | | | | | | | | | | | |

[1] Refer to instructions for explanation of all title functions.

[2] Include "Minority Group Employees" and others. See instruction 6.

[3] In Alaska, include Eskimos and Aleuts with "American Indian."

SECTION V - PART-TIME PAID EMPLOYEES (applicable to all respondents)

| JOB CATEGORIES[1] | ALL EMPLOYEES[2] | | | MINORITY GROUP EMPLOYEES | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | MALE | | | | FEMALE | | | |
| | Total (Col. 2+3) (1) | Male (2) | Female (3) | Negro (4) | Oriental (5) | American Indian[3] (6) | Spanish Surnamed American (7) | Negro (8) | Oriental (9) | American Indian (10) | Spanish Surnamed American (11) |
| Officials and managers | | | | | | | | | | | |
| Professionals | | | | | | | | | | | |
| Technicians | | | | | | | | | | | |
| Sales Workers | | | | | | | | | | | |
| Office and clerical | | | | | | | | | | | |
| Craftsmen (Skilled) | | | | | | | | | | | |
| Operatives (Semi-skilled) | | | | | | | | | | | |
| Laborers (Unskilled) | | | | | | | | | | | |
| Service workers | | | | | | | | | | | |
| TOTAL | | | | | | | | | | | |
| Total employment from previous report (if any) | | | | | | | | | | | |

[1] Refer to instructions for explanation of all title functions.

[2] Include "Minority Group Employees" and others. See instruction 6.

[3] In Alaska, include Eskimos and Aleuts with "American Indian."

# Chapter 3

## PATTERNS OF OWNERSHIP

The question of who should (or should not) own the facilities and control the programming of radio and television stations has been at the very heart of broadcasting since the decision was first made to regulate the use of the public airwaves by licensing them for private profit.[1]

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[1] See Johnson and Hoak, "Media Concentration: Some Observations on the United States' Experience," 56 Iowa L. Rev. 267 (1970).

For, while the allocation of frequencies to local rather than national broadcast service committed an almost wastefully-large chunk of the spectrum to broadcasting, there have always been fewer desirable frequencies available than parties requesting the opportunity to exploit them. No less true today is Justice Frankfurter's 1943 dictum that broadcasting must be subject to governmental regulation because "unlike other modes of expression, radio inherently is not available to all. . . . Because it cannot be used by all, some who wish to use it must be denied. . . ."[2]

The concentration of broadcast outlets in the hands of a few wealthy individuals or corporations would seem to be inimical to the manner of regulation contemplated in the Communications Act of 1934. Not only would those few use up the opportunities of many others (and particularly minority groups who have been almost completely shut out of station ownership), they would provide the basis for an extremely unhealthy situation in which the "voices" utilizing the spectrum would be expressive of far fewer viewpoints than Congress originally intended.

The Commission has always waxed schizophrenic in the promulgation and enforcement of rules and policies designed to alleviate the problems of media control. Diversification of ownership has always been recognized as a valid means to the goal of diversity of "voices," of viewpoints available to the public,[3] but there has also existed considerable confusion regarding the achievement of that goal. The Commission continues to acknowledge that a proper objective should be ". . . the maximum diversity of ownership that technology will allow in each area . . . ,"[4] but its words have become irrevocably clouded by its actions.

In 1971, for example, the Commission decided that ownership interest by anyone in more than seven AM, seven FM or seven television stations (of which no more than five may be VHF) would be contrary to the public interest (the so-called "7-7-7 rule").[5] In late 1972, however, the Commission allowed Cosmos Broadcasting of Louisiana to purchase television station WDSU-TV in New Orleans. The purchase gave the assignee's parent, Cosmos Broadcasting Corporation, the license to its fourth VHF station, three of which are in the same geographic region of the country, but it also gave the South Carolina National Bank of Charleston an interest in its *ninth* VHF station, and a Mr. John Smith an interest in his *eighth*.[6]

Another aspect of media ownership regulation has been the intolerably fragmented promulgation and enforcement (or non-enforcement) of rules and policies regarding different types of ownership problems. The 7-7-7 rule, for example, took no cognizance of cross-ownership among the various broadcast media, thus theoretically permitting each broadcaster to acquire AM–FM–TV combinations in single markets, so long as it did not exceed its "limit" of seven of each. In March of 1970, in an attempt to remedy this omission, the "one-to-a-market" amendment to the multiple ownership rules was adopted.[7] It provided, prospectively only, that the FCC would not approve applications for construction permits or transfers of licenses if more than one full-time broadcasting outlet would be owned or controlled by the same owner in the same market.

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[2] *National Broadcasting Company* v. *United States*, 319 U.S. 190 at 226 (1943).

[3] *See Multiple Ownership of AM, FM, Television Broadcast Stations*, 18 FCC 288, 291 (1953). Although there is no provision in the Federal Communications Act of 1934 dealing specifically with the concentration of ownership, the power to promulgate rules as the multiple ownership rules has been found to lie within the administrative discretion of the FCC under the broad purposes of the Act. *See United States* v. *Storer Broadcasting Co.*, 351 U.S. 192 (1956).

[4] *In the Matter of Amendment of §§ 73.35, 73.240, and 73.636 of the Commission Rules Relating to Multiple Ownership of Standard, FM and Television Broadcast Stations*, 18 P & F Radio Reg. 2d 1735 (1970). One presumes "technology" would allow each individual station in any given region to be licensed to a different person or corporate entity.

[5] 47 C.F.R. § 73.636(a)(2).

[6] WDSU-TV, Inc., 39 FCC 2d 534 (1972).

The one-to-a-market rule created such an outcry among broadcasters, however, that by March of 1971 the Commission had amended it and made it applicable only to combinations of VHF television stations with aural stations in the same market.[8] AM and FM stations in the same market could be commonly owned, and combinations of UHF and aural stations were to be handled on a case-by-case basis. The Commission also noted that the problem of cross-ownership of *newspapers* and television or radio facilities was perhaps more important, but that Commission regulation in this area would be far less effective because the Commission does not regulate newspapers.

The Commission has long been charged with the language of the Supreme Court holding that "Congress intended to leave competition in the business of broadcasting,"[9] and that the Commission "should administer its regulatory powers with respect to broadcasting in the light of the purposes which the . . . [antitrust laws were] designed to achieve."[10] Other recognizably antitrust aspects of the media ownership problem, such as regional concentration or local monopolization of all media, *including newspapers*, could therefore well be reached under this broad mandate. However, the Commission continues essentially to ignore that mandate and to grant new or assigned broadcast facilities to established media interests, as in Los Angeles, where the transfer of an AM–FM combination to an applicant with an interest in the L.A. Times was approved,[11] or in Georgetown, Texas, where an FM license was awarded to an applicant who owned the city's only newspaper, its only AM radio station and its only cable television franchise,[12] or in other cases right down to the present.[13] Only when monopoly abuses can be documented does the Commission take any positive action, as in Mansfield, Ohio, where it denied the application of the Mansfield Journal Company for licenses to construct an AM/FM combination because it found that the Company had used its position as the sole newspaper in the community to exert pressures on advertisers.[14]

Other equally complex facets of the ownership question have arisen in the course of Commission deliberations, but the majority of Commissioners has rarely been inclined to resolve the unique problems attendant each of them. One example might be found in the potential adverse affects of allowing one owner to build a *regional* concentration. This can often occur with far fewer than the "allowable" seven AM, seven FM or seven television stations. Yet it has been difficult (if not impossible) for the Commission to visualize the harm to the local population. There are always, it seems, "sufficient outside media influences" in the air—even if they originate in a large city some 75 miles away—to rationalize a majority conclusion to diminish further the diversity of media voices in a given region. This was the case, for example, earlier this year when the majority granted a new FM facility to an applicant in Muskegon Heights, Michigan, who already owned four AM and two FM stations within the same general Grand Rapids-Kalamazoo metropolitan area.[15]

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[7] *Amendment of Multiple Ownership Rules, supra* note 4.

[8] Amendment of Multiple Ownership Rules, 21 P & F Radio Reg. 2d 1551 (1971).

[9] *F.C.C.* v. *Sanders Bros. Radio Station*, 309 U.S. 470, 475 (1940).

[10] *National Broadcasting Co., supra* note 2. 319 U.S. 190. 223 (1943).

[11] *John Poole Broadcasting Co., Inc and KBIQ, Inc.*, FCC 69–118 (1969).

[12] *Charles R. Fanow, Jr.*, FCC 71–203 (1971).

[13] *See, e.g.*, my dissent in *McPherson Broadcasting, Inc.*, FCC 98757 (1973).

[14] *Mansfield Journal Co.* v. *FCC*, 18 F2d 28 (D.C. Cir. 1950). More recently, see *Greater Boston TV Corp.* v. *FCC, WHDH, Inc.* v. *FCC, et al.*, 444 F2d 891 (D.C. Cir. 1970), in which the Court upheld the award of a newspaper company's Boston VHF television to a competing applicant.

Another distressing line of ownership precedent concerns the tendency of the Commission majority to grant to an owner new stations or major improvements in facilities, either of which essentially "decides" that the owner is qualified to be a broadcast licensee, at a time when those very same qualifications are being called into question in the course of other proceedings before the Commission. Late in 1972, for example, the Commission granted an application for the assignment of WAXY-FM, Fort Lauderdale, Florida to RKO General, Inc., even though RKO's most basic qualifications were being challenged in hearings concerned with the renewal of its VHF television licenses in Los Angeles and Boston.[16]

In undertaking to study nearly 150 television stations in our 50 largest media markets, we had hoped to be able to compare the performance of the "media barons"—the corporate owners possessed of conglomerate interests both within and without the various media—with that of the independent, local owners who would have no such outside interests. That comparison has proved to be impossible, because it is apparent from a brief glance at our ownership tables that virtually none but a small handful of those network affiliates would qualify as even remotely resembling "local" owners. On the information available, just three of the 147 stations in our ownership "sample" were owned by independent owners—i.e., owners with no reported outside interests (including, but by no means limited to broadcasting or other media).[17] And while those three were ranked numbers 54, 56 and 97 in our composite programming rankings (certainly an average enough showing) they hardly constitute a sufficiently large group for adequate comparison with the multiple or multimedia owners.

Multiple owners, on the other hand, seemed to have something of a stranglehold on the television audiences of the top 50 markets. Just 17 large corporations account for the ownership of 68 of the stations in our study, each of them owning three or more affiliates, and the 17 also account for some 137 other reported broadcasting interests. Thirteen other owners each held two of the affiliates in our top 50 study, and that group accounted for some 70 *additional* broadcast holdings among them. In other words, just 30 corporate owners hold the licenses of 94 of the top 50 market network affiliates and also appear to own, among themselves, nearly 4% of *all* the broadcasting stations in the country[18]—with, of course, access to decidedly more than 4% of the nation's audience.

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[15] *Muskegon Heights Broadcasting Co., Inc.*, 39 F.C.C. 2d 475 (1973).

[16] *RKO General*, FCC 72-1201 (1972).

[17] Of course, it is impossible to tell which of even these independents have unreported outside corporate interests, or which of their stockholders or officers might have similar unreported interests. We have been necessarily limited in our study to data available at the F.C.C., and as noted in the text at footnote 22, that data is very often incomplete.

Multimedia owners, with major interests in media other than broadcasting, appear also in epidemic proportion among the licensees of the network affiliates in our top 50 markets. No fewer than 80 American newspapers[19] are co-owned with network affiliates in our study, including at least 38 of our largest urban dailies. A partial listing should give you some feel for the extent of the incestuous cross-ownership between the nation's most profitable television stations and its most powerful newspapers:

Albuquerque Tribune
Baltimore News-American
Baltimore Sun
Boston Record-American
Chattanooga Times
Cincinnati Post and Times-Star
Cleveland Press
Columbus Dispatch
Daily Oklahoman
Dallas Times-Herald
Dallas Morning News
Dayton News
Denver Post
Detroit News
Fort Worth Press
Fort Worth Star-Telegram
Houston Post
Los Angeles Herald-Examiner
Los Angeles Times
Milwaukee Journal
Minneapolis Star and Tribune
New York Times
Newsday
Oklahoma City Times
Pittsburgh Press
San Francisco Chronicle
San Francisco Examiner
St. Louis Post-Dispatch
Washington Evening Star
Washington Post

In addition, it is worth noting some of the numerous other publishing interests represented among the network affiliates in this report:

Fairchild Publications
Pontiac Press
Holt, Rinehart and Winston
Phoenix Magazine
Cosmopolitan
Vogue
Good Housekeeping
Better Homes and Gardens
House and Garden
Sports Afield
Avon Books
Popular Mechanics
United Technical Publications
Successful Farming
Random House
World Almanac
Time
Fortune
Sports Illustrated
Time-Life Books
Mademoiselle
Glamour
Harpers Bazaar
Newsweek
McGraw Hill
Corinthian
Science Digest
Money

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[18] What's more, even those figures do not come close to telling the full story, since among that 4% are probably well over half of the most highly profitable radio and television properties in the country.

[19] The precise number is difficult to determine, since some licensees list merely the corporate owner for a group of smaller newspapers in their form 323.

To these publishing interests must be added the myriad cable television systems and franchises still held by these licensees.[20]

How, then, are we to analyze the information we have gathered from Commission records? In the first place, we would do well to note that the information accumulated by the Commission, largely from the form 323 ownership reports,[21] is by no means complete (or even absolutely accurate). For example, nowhere in the FCC files can we locate any information about the type or extent of defense subsidiaries known to be owned by licensees like Avco or Westinghouse or General Electric. Often, multi-billion dollar conglomerate holdings are merely summarized, for purposes of the form 323, with innocuous phrases like "additional manufacturing interests" or "various product subsidiaries." Moreover, the major stockholders and/or officers of those corporations—the persons who can actually be found to be exercising the most significant control over the policies of the stations—are rarely identified satisfactorily by the anonymous corporate licensees, and the outside interests of those individuals are rarely enumerated for the FCC's information. A *thorough* report on patterns of ownership, which would study conglomerates and subsidiaries, ties through directorships or individual shareholders or financial institutions, and so forth, would quite simply require as many man-hours of well-structured research as were spent on this entire report, even if we were to limit ourselves to the top 50 markets. It once took the FCC *18 months* to prepare a simple report of its ownership information for a Senate Committee—and even then the Committee was able to point out errors.

We should use this section, then, primarily to underscore the current state of media ownership in America today, and secondarily to make note of the relative performance in areas of programming and employment of our "media baron" licensees. It can be seen, for example, that some of the conglomerate owners have done markedly better than others. There can be no question but that the Westinghouse Corporation, whose five stations rank a truly remarkable 1, 2, 4, 5 and 31 in overall programming, cares more about its audience (among the conglomerate owners) than, say, Taft Broadcasting, whose five stations rank 49, 120, 123, 134 and 136, or ABC, whose five were ranked 13, 76, 102, 115 and 117.

Other results were not nearly so clear-cut, however, with curious spreads for owners like Hearst (8, 48, 132) or Cox Broadcasting Corp. (15, 31, 57, 126) or Combined Communications (23, 91, 142) scattering their stations all over the programming charts. Given greater manpower and more time, the programming ownership data would perhaps have been analyzed further; until that opportunity occurs, we have attempted to gather as much information as possible in the ownership tables that follow, and leave it to others to assimilate that information.

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[20] These are too numerous, and often too ill-defined, to set out here. There are hundreds of cable systems and franchises cross-owned with the broadcasting properties in this Report; however, Commission Rules specifically prohibit cross-ownership of cable and broadcast facilities in the same market, and require divestiture of all facilities so held of one type or the other by August 10, 1973. 47 C.F.R. § 76.501.

[21] Required by 47 C.F.R. § 1.615.

The Tables below are designed to provide a maximum amount of information about each of the owners represented in the study. Table 16 simply lists the stations alphabetically by their call letters and provides a cross reference to the name of the owner as it will be listed in Table 17. Table 17 contains 17 separate columns, with entries for the owner (listed alphabetically), the stations falling within our top 50 market study, the market number, location, channel number, and network affiliation of each station, its composite programming rank, its rank in each of the major programming areas, and its rank in employment of minorities and women. The remaining columns list the owners' additional interests, to the extent available at the Commission, in other broadcasting stations, newspapers or publishing media, and other unrelated corporate interests. An asterisk (*) next to a listing in one of these three columns indicates a *controlling* (though not necessarily 100%) interest in the company, if under some other corporate or individual's name. A double asterisk (**) indicates less than a controlling interest in the company.

TABLE 16.—*Cross Reference of Owners to Call Letters*

[Alphabetically by call letter]

| Call ltrs | Location | Owner |
|---|---|---|
| KABC | Los Angeles | American Broadcasting Companies, Inc. |
| KATU | Portland | Fisher Companies, Inc. |
| KBTV | Denver | Combined Communications Corp. |
| KCMO | Kansas City | Meredith Corporation. |
| KCPX | Salt Lake City | Columbia Pictures Industries, Inc. |
| KCRA | Sacramento/Stockton | Kelly Broadcasting Co. (Partnership) |
| KDFW | Dallas/Fort Worth | Times Mirror Co. |
| KDKA | Pittsburgh | Westinghouse Electric Corp. |
| KENS | San Antonio | Harte-Hanks Newspapers, Inc. |
| KFMB | San Diego | Midwest Television Inc. |
| KGO | San Francisco | American Broadcasting Companies, Inc. |
| KGTV | San Diego | McGraw-Hill Inc. |
| KGW | Portland | King Broadcasting Co. |
| KHOU | Houston | Dun & Bradstreet, Inc. |
| KING | Seattle/Tacoma | King Broadcasting Co. |
| KIRO | Seattle/Tacoma | Bonneville International Inc. |
| KMBC | Kansas City | Metromedia, Inc. |
| KMGH | Denver | McGraw-Hill Inc. |
| KMOX | St. Louis | Columbia Broadcasting System Inc. |
| KMSP | Minneapolis/St. Paul | Twentieth Century-Fox Film Corp. |
| KNBC | Los Angeles | RCA Corportion |
| KNXT | Los Angeles | Columbia Broadcasting System Inc. |
| KOA | Denver | General Electric Company |
| KOCO | Oklahoma City | Combined Communications Corp. |
| KOIN | Portland | Newhouse Broadcasting Co. (50%) (Orig Own 50%) |
| KOMO | Seattle/Tacoma | Fisher Companies Inc. |
| KOOL | Phoenix | G. Autry (55%), T. Chauncey (20%) A. Kerney (19%), F. Beer (5%); listed under KOOL Radio-Television, Inc., licensee |
| KOVR | Sacramento/Stockton | Metropolitan Broadcasting Corp. |
| KPIX | San Francisco | Westinghouse Electric Corp. |
| KPRC | Houston | Houston Post |
| KRON | San Francisco | Chronicle Publishing Co. |
| KSAT | San Antonio | The Outlet Company |
| KSD | St. Louis | Pulitzer Publishing Co. |
| KSL | Salt Lake City | Bonneville International Corp. |
| KSTP | Minneapolis/St. Paul | Hubbard Broadcasting Inc. |
| KTAR | Phoenix | KTAR Broadcasting Co. |
| KTRK | Houston | Capital Cities Broadcasting Corp. |
| KTVI | St. Louis | Newhouse Broadcasting Corp. |
| KTVK | Phoenix | E. McFarland (41%) (various small %'s); listed under Arizona Television, Inc. licensee |
| KUTV | Salt Lake City | Standard Corp. (80%) CIC (20%) |
| KWTV | Oklahoma City | Griffin Television Inc. |
| KXTV | Sacramento/Stockton | Dun & Bradstreet, Inc. |
| KYW | Philadelphia | Westinghouse Electric Corp. |
| WABC | New York City | American Broadcasting Companies, Inc. |
| WAGA | Atlanta | Storer Broadcasting Co. |

TABLE 16.—*Cross Reference of Owners to Call Letters*—**Continued**

[Alphabetically by call letter]

| Call ltrs | Location | Owner |
|---|---|---|
| WAPI | Birmingham | Newhouse Broadcasting Corp. |
| WAST | Albany/Schenectady/Troy | Sonderling Broadcasting Corp. |
| WAVE | Louisville | Orion Broadcasting, Inc. |
| WAVY | Norfolk/Newport News | Lin Broadcasting Corp. |
| WBAL | Baltimore | Hearst Corp. |
| WBAP | Dallas/Fort Worth | Carter Publications, Inc. |
| WBBM | Chicago | Columbia Broadcasting System Inc. |
| WBEN | Buffalo | Buffalo Evening News |
| WBMG | Birmingham | Southern Broadcasting (33%) (various small %'s) |
| WBNS | Columbus | Dispatch Printing Co. |
| WBRC | Birmingham | Taft Broadcasting Co. |
| WBTV | Charlotte | Jefferson Pilot Corp. |
| WBZ | Boston | Westinghouse Electric Corp. |
| WCAU | Philadelphia | Columbia Broadcasting System, Inc. |
| WCBS | New York City | Columbia Broadcasting System, Inc. |
| WCCB | Charlotte | Mecklenburg Television Broadcasters Inc. |
| WCCO | Minneapolis/St. Paul | Mid-Continent TV (53%), Mpls Star (47%) |
| WCHS | Charleston/Huntington | Rollins, Inc. |
| WCKT | Miami | Sunbeam Television Corp. |
| WCPO | Cincinnati | Scripps-Howard Broadcasting Co. |
| WDAF | Kansas City | Taft Broadcasting Co. |
| WDHO | Toledo | Overmeyer Co. Inc. |
| WDSU | New Orleans | Cosmos Broadcasting Corp. |
| WEWS | Cleveland | Scripps-Howard Broadcasting Co. |
| WFAA | Dallas/Fort Worth | Dallas Evening News |
| WFBC | Greenville/Spartanburg/Asheville | Multimedia, Inc. |
| WFLA | Tampa/St. Petersburg | Media General Inc. |
| WFMY | Greensboro/Winston Salem/High Point. | Landmark Communications Inc. |
| WGHP | Greensboro/Winston Salem/High Point. | Southern Broadcasting Co., Inc. |
| WGR | Buffalo | Taft Broadcasting Co. |
| WHAS | Louisville | WHAS, Inc. |
| WHBQ | Memphis | RKO General Inc. |
| WHEN | Syracuse | Meredith Corp. |
| WHIO | Dayton | Cox Broadcasting Corp. |
| WHNB | Hartford/New Haven | Plains Television Corp. |
| WHTN | Charleston/Huntington | Reeves Broadcasting Corp. |
| WIIC | Pittsburgh | Cox Broadcasting Corp. |
| WISH | Indianapolis | Corinthian Broadcasting Corp. |
| WISN | Milwaukee | Hearst Corp. |
| WITI | Milwaukee | Storer Broadcasting Co. |
| WJAR | Providence | The Outlet Company |
| WJBK | Detroit | Storer Broadcasting Co. |
| WJW | Cleveland | Storer Broadcasting Co. |
| WJZ | Baltimore | Westinghouse Electric Corp. |
| WKBW | Buffalo | Capital Cities Broadcasting Corp. |
| WKEF | Dayton | Springfield Television Broadcasting Corp. |
| WKY | Oklahoma City | WKY Television System, Inc. |
| WKRC | Cincinnati | Taft Broadcasting Co. |
| WKYC | Cleveland | RCA Corporation |
| WKZO | Grand Rapids/Kalamazoo | Fetzer Communications, Inc. |
| WLAC | Nashville | Life & Casualty Ins. Co. (50%); T. Baker, Jr. (25%), A. Beaman (25%) |
| WLCY | Tampa/St. Petersburg | Rahall Communications Corp. |
| WLKY | Louisville | Sonderling Broadcasting Co. |
| WLOS | Greenville/Spartanburg/Asheville | Wometco Enterprises, Inc. |
| WLS | Chicago | American Broadcasting Companies |
| WLWC | Columbus | Avco Corp. |
| WLWD | Dayton | Avco Corp. |
| WLWI | Indianapolis | Avco Corp. |
| WLWT | Cincinnati | Avco Corp. |
| WMAL | Washington, D.C | Evening Star Newspaper Co. |
| WMAQ | Chicago | RCA Corporation |
| WMAR | Baltimore | A. S. Abell Co. |
| WMC | Memphis | Scripps-Howard Broadcasting Co. |
| WNAC | Boston | RKO General Inc. |
| WNBC | New York City | RCA Corporation |
| WNYS | Syracuse | The Outlet Corp. |
| WOAI | San Antonio | Avco Corp. |
| WOTV | Grand Rapids/Kalamazoo | Time, Inc. |
| WPLG | Miami | Post Newsweek Stations, Inc. |
| WPRI | Providence | Poole Broadcasting Co. |
| WPVI | Philadelphia | Capital Cities Broadcasting Corp. |
| WQXI | Atlanta | Pacific & Southern Broadcasting Co., Inc. |
| WRC | Washington, D.C | RCA Corporation |
| WREC | Memphis | New York Times Co. |

**Table 16.**—*Cross Reference of Owners to Call Letters*—Continued

[Alphabetically by call letter]

| Call ltrs | Location | Owner |
|---|---|---|
| WRGB | Albany/Schenectady/Troy | General Electric Co. |
| WRTV | Indianapolis | McGraw-Hill, Inc. |
| WSAZ | Charleston/Huntington | Lee Enterprises, Inc. |
| WSB | Atlanta | Cox Broadcasting Corp. |
| WSIX | Nashville | General Electric Company |
| WSM | Nashville | NLT Corp. |
| WSOC | Charlotte | Cox Broadcasting Corp. |
| WSPA | Greenville/Spartanburg/Asheville | Spartan Radiocasting Co. |
| WSPD | Toledo | Storer Broadcasting Co. |
| WSYR | Syracuse | Newhouse Broadcasting Corp. |
| WTAE | Pittsburgh | Hearst Corp. |
| WTAR | Norfolk/Newport News | Landmark Communications Inc. |
| WTEN | Albany/Schenectady/Troy | Poole Broadcasting Co. |
| WTEV | Providence | WGAL-TV |
| WTIC | Hartford/New Haven | Travelers Corp. |
| WTMJ | Milwaukee | The Journal Co. |
| WTNH | Hartford/New Haven | Capital Cities Broadcasting Corp. |
| WTOL | Toledo | Cosmos Broadcasting Corp. |
| WTOP | Washington, D.C. | Post-Newsweek Stations, Inc. |
| WTVJ | Miami | Wometco Enterprises, Inc. |
| WTVN | Columbus | Taft Broadcasting Co. |
| WTVT | Tampa/St. Petersburg | WKY Television System Inc. |
| WVEC | Norfolk/Newport News | Peninsula Broadcasting Corp. |
| WVUE | New Orleans | Columbia Pictures Industries Inc. |
| WWJ | Detroit | The Evening News Association |
| WWL | New Orleans | Loyola University |
| WXII | Greensboro/Winston Salem/High Point. | Multimedia, Inc. |
| WXYZ | Detroit | American Broadcasting Companies, Inc. |
| WZZM | Kalamazoo/Grand Rapids | Synercom |

TABLE 17.—*Ownership Information*

| Owner | Station(s) | Channel | Affiliation | Market | Mkt. No. | Rank | Local | News | Comm. | Fin. | Min. | Women | PSA | Interest or ownership | | Other |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | | | | | | Other broadcasting | Publishing | |
| A. S. Abell Co. | WMAR-TV | 2 | CBS | Baltimore | 19 | 34 | 11 | 25 | 78 | 104 | 110 | 105 | 41 | WMAR-FM (Baltimore).<br>WBOC-AM (Salisbury, Md.).<br>WBOC-FM "<br>WBOC-TV " | Baltimore *Sun* | |
| American Broadcasting Co., Inc. | KABC-TV | 7 | ABC | Los Angeles | 2 | 102 | 123 | 115 | 96 | 17 | 34 | 6 | 43 | WABC-AM (N.Y.)<br>WPLJ-FM (N.Y.)<br>WLS-AM (Chicago)<br>WDAI-FM (Chicago).<br>KGO-AM (S.F.)<br>KSFX-FM (S.F.)<br>KABC-AM (L.A.)<br>KLOS-FM (L.A.)<br>WXYZ-AM (Detroit).<br>WRIF-FM (Detroit).<br>KQV-AM (Pittsburgh).<br>WDVE-FM (Pittsburgh).<br>KXYZ-AM (Houston).<br>KAUM-FM (Houston). | ........ | ABC Films, Inc.<br>ABC Int. Television.<br>ABC Records, Inc.<br>ABC Record and Tape Sales<br>ABC Pictures Corp.<br>ABC Theatre Holdings, Inc.<br>ABC Sports, Inc. |
| | KGO-TV | 7 | ABC | San Francisco | 8 | 76 | 94 | 70 | 99 | 30 | 42 | 34 | 106 | | | |
| | WABC-TV | 7 | ABC | New York | 1 | 13 | 63 | 77 | 56 | 1 | 98 | 65 | 62 | | | |
| | WLS-TV | 7 | ABC | Chicago | 3 | 115 | 53 | 61 | 143 | 68 | 63 | 25 | 87 | | | |
| | WXYZ-TV | 7 | ABC | Detroit | 5 | 117 | 89 | 116 | 135 | 26 | 97 | 18 | 141 | | | |
| Arizona Television Co. (licensee) (controlling interest by E. McFarland). | KTVK-TV | 3 | ABC | Phoenix | 45 | 97 | 98 | 122 | 49 | 75 | 91 | 16 | 111 | ........ | ........ | |

TABLE 17.—*Ownership Information*—Continued

| Owner | Station(s) | Channel | Affiliation | Market | Mkt. No. | Rank | Local | News | Comm. | Fin. | Min. | Women | PSA | Interest or ownership | | Other |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | | | | | | Other broadcasting | Publishing | |
| Avco Corp. | WLWC-TV | 4 | NBC | Columbus, O. | 28 | 131 | 99 | 67 | 121 | 118 | 15 | 27 | 91 | WWDC-AM (Wash., D.C.).<br>WWDC-FM "<br>KYA-AM-FM (San Francisco)<br>KOIT-FM "<br>WOAI-AM (San Antonio)<br>WRTH-AM (St. Louis) | | Avco Embassy Pictures.<br>Carte Blanche<br>Avco Radio Television Sales, Inc.<br>Avco Program Sales,<br>Avco Film & various manufacturing interests |
| | WLWD-TV | 2 | NBC | Dayton | 39 | 83 | 30 | 42 | 137 | 83 | 36 | 81 | 79 | | | |
| | WLWI-TV | 13 | ABC | Indianapolis | 14 | 65 | 64 | 26 | 130 | 37 | 47 | 8 | 50 | | | |
| | WLWT-TV | 5 | NBC | Cincinnati | 20 | 25 | 1 | 118 | 129 | 44 | 36 | 87 | 36 | | | |
| | WOAI-TV | 4 | NBC | San Antonio | 45 | 58 | 58 | 88 | 31 | 93 | 123 | 92 | 38 | | | |
| Bonneville Int. Corp. | KIRO-TV | 7 | CBS | Seattle/ Tacoma | 16 | 114 | 66 | 83 | 109 | 125 | 39 | 122 | 140 | KSL-AM (Salt Lake)<br>KSL-FM "<br>KIRO-AM (Seattle) "<br>KIRO-FM "<br>WNEW-AM (N.Y.)<br>WFRM-FM "<br>KMBZ-AM (K.C.)<br>KMBR-FM (K.C.)<br>KBIG-AM (L.A.)<br>KXTZ-FM "<br>KBYU-FM (Provo, U.)<br>KBYU-TV "<br>WCLR-FM (Skokie, Ill.) | Salt Lake City *Desert News* | The Church of Jesus Christ of the Latter Day Saints<br>Brigham Young University<br>CATV (Seattle, Wash.**; Logan, Utah; Ogden, U.; Salt Lake City, U.*) |
| | KSL-TV | 5 | CBS | Salt Lake City | 50 | 33 | 57 | 90 | 88 | 6 | 145 | 147 | 118 | | | |
| Buffalo Evening News Inc. | WBEN-TV | 4 | CBS | Buffalo | 25 | 38 | 55 | 21 | 60 | 80 | 130 | 136 | 35 | WBEN-AM (Buffalo)<br>WBEN-FM " | Buffalo *Evening News* | |

| | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Capital Cities Broadcasting Corp. | KTRK-TV | 13 | ABC | Houston.... | 15 | 64 | 18 | 95 | 69 | 100 | 102 | 106 | 101 | WKBW-AM (Buffalo)<br>KFRE-TV (Fresno, Cal.)<br>WTVD-TV (Durham, N.C.)<br>WPAT-AM (Paterson, N.J.)<br>WPAT-FM "<br>KPOL-AM (L.A.)<br>KPOL-FM (L.A.)<br>WPRO-AM (Providence)<br>WPRO-FM " | Fairchild Publications<br>Pontiac Press Co. | |
| | WKBW-TV | 7 | ABC | Buffalo...... | 25 | 73 | 78 | 106 | 21 | 109 | 25 | 123 | 31 | | | |
| | WPVI-TV | 6 | ABC | Philadelphia | 4 | 50 | 14 | 62 | 113 | 45 | 56 | 51 | 10 | | | |
| | WTNH-TV | 8 | ABC | Hartford/ New Haven | 22 | 95 | 81 | 81 | 57 | 124 | 65 | 141 | 28 | | | |
| Carter Publications, Inc. | WBAP-TV | 5 | NBC | Dallas/Ft. Worth | 11 | 93 | 132 | 50 | 36 | 115 | 96 | 100 | 30 | WBAP-AM (Ft. Worth)<br>WBAP-FM " | Ft. Worth *Star-Telegram* | |
| Houston Post/ Channel 2 TV Co. | KPRC-TV | 2 | NBC | Houston.... | 15 | 41 | 29 | 22 | 79 | 94 | 132 | 107 | 12 | KPRC-AM (Houston) | Houston *Post* | |
| Chronicle Pub. Co. | KRON-TV | 4 | NBC | San Francisco | 8 | .......... | | | | | 114 | 63 | ....... | KRON-FM (San Francisco) | San Francisco *Chronicle* | Western Communications CATV (Carmel-by-the Sea, Ca. Chico, Ca.; Croning, Ca.; Orlando, Ca.; San Mateo Cy., Ca.; Willows, Ca.; Concord, Ca.;)<br>Western TV Cable CATV (S. San Fran., Ca.). |

TABLE 17.—*Ownership Information*—Continued

| Owner | Station(s) | Channel | Affiliation | Market | Mkt. No. | Rank | Local | News | Comm. | Fin. | Min. | Women | PSA | Interest or ownership: Other broadcasting | Interest or ownership: Publishing | Other |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Columbia Broadcasting System, Inc. | KMOX-TV | 4 | CBS | St. Louis | 12 | 27 | 59 | 11 | 105 | 36 | 31 | 32 | 49 | WCBS-AM (New York).<br>WCBS-FM "<br>WCAU-AM (Phila.)<br>WCAU-FM "<br>WBBM-AM (Chicago)<br>WBBM-FM "<br>KMOX-AM (St. Louis)<br>KMOX-FM "<br>KCBS-AM (San Fran.)<br>KCBS-FM "<br>WEEI-AM (Boston)<br>WEEI-FM "<br>KNX-AM (Los Angeles)<br>KNX-FM (Hollywood) | Holt, Rinehart, and Winston | CBS Int'l.<br>CBS Musical Interests<br>Cinema Center Films<br>CBS Laboratories<br>Creative Playthgs<br>W. B. Saunders Co.<br>CBS Schools, Inc.<br>Viacom Int'l CATV (Fairfax, Ca.; Heraldsburg Ca.; San Geronimo Valley, Ca.; Sausalito, Ca.; Sonora, Ca.; Bellevue, Wa.: Port Angeles, Wa.; Seattle, Wa.); Telerama Inc. CATV (17 systems); Tele-vue Systems Inc. CATV (22 systems); Nor-Cal Cablevision Inc.** CATV (2 systems) |
|  | KNXT-TV | 2 | CBS | Los Angeles | 2 | 40 | 21 | 8 | 128 | 88 | 112 | 72 | 85 |  |  |  |
|  | WBBM | 2 | CBS | Chicago | 3 | 74 | 33 | 18 | 141 | 65 | 81 | 33 | 52 |  |  |  |
|  | WCAU-TV | 10 | CBS | Philadelphia | 4 | 46 | 42 | 9 | 127 | 73 | 59 | 1 | 38 |  |  |  |
|  | WCBS-TV | 2 | CBS | New York | 1 | 26 | 75 | 4 | 111 | 27 | 75 | 13 | 22 |  |  |  |

| | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Columbia Pictures Industries Inc. (Screen Gems Broadcasting) | KCPX-TV | 4 | ABC | Salt Lake City. | 50 | 109 | 142 | 136 | 16 | 40 | 85 | 116 | 29 | KCPX-AM (Salt Lake City).<br>KCPX-FM "<br>WNJU-TV (Newark)<br>WAPA-TV (San Juan)<br>**WOLE-TV (Aguadilla-Mayaguez, P.R.) | ---------------- | Screen Gems Productions<br>Screen Gems-Columbia Music Inc.<br>Roosevelt Music<br>Bell Records<br>Learning Corp. of America<br>Columbia Pictures |
| | WVUE-TV | 8 | ABC | New Orleans. | 31 | 79 | 107 | 112 | 44 | 31 | 117 | 15 | 72 | | | |
| Combined Communications Inc. | KBTV-TV | 9 | ABC | Denver...... | 32 | 142 | 91 | 128 | 142 | 42 | 113 | 95 | 123 | KTAR-AM (Phoenix).<br>KTAR-FM "<br>KBLU-AM (Yuma)<br>KBLU-TV " | *Phoenix* mag.<br>*Outdoor Arizona* | Eller Outdoor Advertising |
| | KOCO-TV | 5 | ABC | Oklahoma City. | 41 | 91 | 62 | 124 | 81 | 53 | 17 | 117 | 33 | | | |
| | KTAR-TV | 12 | NBC | Phoenix...... | 45 | 23 | 8 | 64 | 66 | 48 | 45 | 62 | 88 | | | |
| Cosmos Broadcasting Corp. | WDSU-TV | 6 | NBC | New Orleans. | 31 | 36 | 20 | 55 | 82 | 55 | 115 | 77 | 136 | WSFA-TV (Montgomery).<br>WIS-AM (Columbia, S.C.)<br>WIS-TV " | ---------------- | |
| | WTOL-TV | 11 | CBS | Toledo....... | 45 | 98 | 87 | 71 | 65 | 122 | 38 | 20 | 103 | | | |
| Cox Broadcasting Corp. | WHIO-TV | 7 | CBS | Dayton...... | 39 | 126 | 45 | 123 | 133 | 87 | 23 | 114 | 143 | WSB-AM (Atlanta).<br>WSB-FM "<br>WHIO-AM (Dayton).<br>WHIO-FM "<br>WIOD-AM (Miami).<br>WAIA-FM "<br>KTVU-TV (Oakland).<br>WSOC-AM (Charlotte).<br>WSOC-FM " | United Technical Publications<br>*Dayton *News* | Bing Crosby Productions<br>Cox Cable Communications<br>CATV (29 systems owned and 3 others partly-owned)<br>CATV** (2 Cleveland area systems)<br>Video Service Company |
| | WIIC-TV | 11 | NBC | Pittsburgh... | 9 | 15 | 17 | 53 | 101 | 8 | 24 | 22 | 56 | | | |
| | WSB-TV | 2 | NBC | Atlanta...... | 17 | 31 | 5 | 56 | 54 | 116 | 101 | 74 | 78 | | | |
| | WSOC-TV | 9 | NBC | Charlotte.... | 35 | 57 | 122 | 75 | 18 | 47 | 90 | 110 | 109 | | | |
| Dallas Evening News | WFAA-TV | 8 | ABC | Dallas/Ft. Worth | 11 | 85 | 47 | 114 | 75 | 85 | 95 | 37 | 67 | WFAA-AM (Dallas).<br>WFAA-FM "<br>WDFM-TV (Beaumont, Tx.) | News-Texan<br>Dallas *Morning News*<br>6 suburban dailies | |

TABLE 17.—*Ownership Information*—Continued

| Owner | Station(s) | Channel | Affiliation | Market | Mkt. No. | Rank | Local | News | Comm. | Fin. | Min. | Women | PSA | Interest or ownership: Other broadcasting | Interest or ownership: Publishing | Other |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Dispatch Printing Co. | WBNS | 10 | CBS | Columbus... | 28 | 22 | 22 | 19 | 85 | 61 | 33 | 45 | 14 | WBNS-AM (Columbus).<br>WBNS-FM " | *Columbus *Dispatch.*<br>*Dispatch Printing Co. | |
| Dun & Bradstreet. | KHOU-TV | 11 | CBS | Houston.... | 15 | 70 | 25 | 30 | 110 | 127 | 105 | 82 | 60 | KOTV-TV (Tulsa).<br>WANE-TV (Ft. Worth). | Corinthian Editors, Inc. | Corinthian Broadcasting Corp. owned by Dun & Bradstreet. |
| | KXTV-TV | 10 | CBS | Sacramento/ Stockton | 27 | 105 | 101 | 36 | 122 | 66 | 125 | 50 | 74 | | | |
| | WISH-TV | 13 | ABC | Indianapolis. | 14 | 104 | 73 | 65 | 80 | 135 | 57 | 28 | 67 | | | |
| Evening News Assn. | WWJ-TV | 4 | NBC | Detroit...... | 5 | 69 | 9 | 31 | 131 | 112 | 94 | 109 | 83 | WWJ-AM (Detroit).<br>WWJ-FM "<br>KOLD-TV (Tucson)<br>WALA-TV (Mobile) | Detroit *News*. | |
| Evening Star Broadcasting Co. | WMAL-TV | 7 | ABC | Wash., D.C. | 10 | 7 | 4 | 6 | 30 | 57 | 87 | 2 | 17 | WMAL-AM (Wash., D.C.)<br>WMAL-FM "<br>WLVA-TV (Lynchburg, Va.)<br>WLVA-AM "<br>WCIV-TV (Charleston, S.C.)<br>WCIV-AM " | *Evening Star* Wash., D.C. | |
| Petzer Communications Inc. | WKZO-TV | 3 | CBS | Grand Rapids/ Kalamazoo | 41 | 138 | 108 | 100 | 91 | 142 | 147 | 131 | 129 | KOLN-TV (Lincoln)<br>KGIN-TV (Grand Island, Me.)<br>*KMEG-TV (Sioux City)<br>*WKZO-AM (Kalamazoo)<br>*WJEF-AM (Grand Rapids)<br>*WJEF-FM "<br>*WWTV-TV (Cadillac)<br>*WWTV-AM "<br>*WWTV-FM " | --------------- | Wolverine Cablevision CATV (Albion, Mi., Battle Creek, Mi.) |

| | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Fisher Companies, Inc. | KOMO-TV | 4 | ABC | Seattle/ Tacoma | 16 | 24 | 32 | 66 | 61 | 28 | 61 | 10 | 25 | KOMO-AM (Seattle) | -------------- | |
| | KATU-TV | 2 | ABC | Portland.... | 26 | 18 | 50 | 96 | 25 | 13 | 21 | 68 | 54 | -------------------- | -------------- | |
| General Electric Co. | KOA-TV | 4 | NBC | Denver..... | 32 | 113 | 56 | 79 | 108 | 132 | 138 | 71 | 61 | KOA-AM (Denver)<br>KOA-FM "<br>WSIX-AM (Nashville)<br>WSIX-FM "<br>WGY-AM (Schenectady)<br>WGY-FM " | -------------- | Manufacturing merchandising financial General Electric Cablevision Corp. CATV (Merced-Atwater, Ca.; Tracey, Ca.; Vacaville, Ca.; Walnut Creek, Ca.; Decatur, Il.; Anderson, In.; Biloxi, Ms.; Hattiesburg, Ms.; Watertown, N.Y.; and 12 franchises) |
| | WSIX-TV | 8 | ABC | Nashville... | 30 | 61 | 82 | 125 | 32 | 22 | 70 | 9 | 138 | | | |
| | WRGB-TV | 6 | NBC | Albany-Schenectady/ Troy | 37 | 118 | 100 | 121 | 39 | 129 | 135 | 97 | 26 | | | |
| John T. Griffin. | KWTV-TV | 9 | CBS | Oklahoma City | 41 | 54 | 77 | 82 | 77 | 25 | 12 | 61 | 8 | -------------------- | -------------- | |
| Harte-Hanks Newspapers | KENS-TV | 5 | CBS | San Antonio | 45 | 130 | 106 | 93 | 88 | 134 | 104 | 84 | 64 | -------------------- | Express Pub. Co. (San Angelo *Standard-Times;* Abilene *Reporter* News; Big Spring *Herald;* Corpus Christi *Caller Times;* Denison *Herald;* Marshall *News Messenger;* Greenville *Herald-Banner* | |

TABLE 17.—*Ownership Information*—Continued

| Owner | Station(s) | Channel | Affiliation | Market | Mkt. No. | Rank | Local | News | Comm. | Fin. | Min. | Women | PSA | Interest or ownership: Other broadcasting | Interest or ownership: Publishing | Other |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Hearst Corp. | WBAL-TV | 11 | NBC | Baltimore | 19 | 48 | 19 | 33 | 95 | 101 | 61 | 56 | 21 | WBAL-AM (Baltimore)<br>WBAL-FM "<br>WISN-AM (Milwaukee)<br>WISN-FM "<br>WTAE-AM (Pittsburgh)<br>WTAE-FM "<br>WAPA-AM (San Juan) | Baltimore *News-American*<br>Los Angeles *Herald-Examiner*<br>San Francisco *Examiner*<br>Boston *Record-American*<br>San Antonio *Light*<br>Seattle *Post-Intelligencer*<br>*Good Housekeeping*<br>*Cosmopolitan*<br>*Harpers Bazaar*<br>*Sports Afield*<br>*Popular Mechanics*<br>*Science Digest*<br>Avon books | |
| | WISN-TV | 12 | CBS | Milwaukee | 21 | 132 | 97 | 98 | 123 | 82 | 118 | 90 | 58 | | | |
| | WTAE-TV | 4 | ABC | Pittsburgh | 9 | 8 | 52 | 60 | 10 | 15 | 32 | 93 | 16 | | | |
| Hubbard Broadcasting Co. Inc. | KSTP-TV | 5 | NBC | Minneapolis/St. Paul | 13 | 59 | 43 | 91 | 62 | 71 | 91 | 73 | 126 | KOB-TV (Albuquerque)<br>KOB-AM "<br>WTOG-TV (St. Petersburg)<br>KSTP-AM-FM (Minn. St. Paul)<br>WGTO-AM (Cypress Gardens, Fl.) | ---------------- | |
| Jefferson Pilot Corp. | WBTV-TV | 3 | CBS | Charlotte | 35 | 82 | 46 | 52 | 93 | 120 | 134 | 52 | 63 | WBT-AM (Charlotte)<br>WBT-FM "<br>WWBT-TV (Richmond)<br>WBIG-AM (Greensboro) | ---------------- | Jefferson Productions |

| | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Journal Co...... | WTMJ-TV | 4 | NBC | Milwaukee.. | 21 | 74 | 13 | 92 | 107 | 89 | 44 | 76 | 135 | WTMJ-AM (Milwaukee).<br>WTMJ-FM " | *Milwaukee *Journal* | Midwestern Relay Company (closed circuit) CATV (Stevens Point, Wi.; Wausau, Wi.; Whiting, Wi.) |
| Kelly Broadcasting Co. | KCRA-TV | 8 | NBC | Sacramento/Stockton | 27 | 20 | 27 | 14 | 73 | 69 | 86 | 124 | 77 | KCRA-AM (Sacramento)<br>KCTC-FM " | --------------- | |
| King Broadcasting Co. | KGW-TV | 8 | NBC | Portland.... | 26 | 10 | 67 | 35 | 53 | 2 | 7 | 88 | 32 | KING-AM (Seattle)<br>KING-FM "<br>KREM-TV (Spokane)<br>KREM-AM "<br>KREM-FM "<br>KGW-AM (Portland)<br>KINK-FM " | --------------- | King Videocable Co. CATV (Lodi, Ca.; Los Angeles, Ca.; Placerville, Ca.; Lake Oswego, Ca.; Portland, Ca.; Ellensburg, Wa.; Montesano, Wa.; Westport, Wa.; Kelso, Wa.; Seattle, Wa.; Bothell, Wa.)<br>**Valley Vision Inc. CATV (3 systems and 2 franchises) |
| | KING-TV | 5 | NBC | Seattle/Tacoma | 16 | 3 | 76 | 48 | 6 | 3 | 6 | 35 | 133 | | | |
| KOOL Radio-Television, Inc. (licensee) (controlling interest by Gene Autry). | KOOL-TV | 10 | CBS | Phoenix..... | 45 | 140 | 98 | 76 | 140 | 119 | 67 | 115 | 11 | KOOL-FM (Phoenix). | --------------- | |

TABLE 17.—*Ownership Information*—Continued

| Owner | Station(s) | Channel | Affiliation | Market | Mkt. No. | Rank | Local | News | Comm. | Fin. | Min. | Women | PSA | Interest or ownership | | Other |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | | | | | | Other broadcasting | Publishing | |
| Landmark Communications Inc. | WFMY-TV | 2 | CBS | Greensboro/High Point/Winston-Salem. | 48 | 9 | 96 | 38 | 2 | 76 | 83 | 75 | 91 | [Not legible]<br>WTAR-AM (Norfolk).<br>WTAR-FM (Norfolk). | Norfolk *Virginian-Pilot*<br>*Ledger Star*<br>Greensboro *Daily News.* | Telecable Corp. CATV (Auburn, Ga.; Columbus, Ga.; Decatur, Al.; Opelika, Al.; Selma, Al.; Bloomington, Il.; Kokomo, In.; Roanoke Rapids, N.C.; Wytheville, Va.; Beckley, W.Va; Princeton, W.Va.; Racine, Wi. and 7 franchises) |
| | WTAR-TV | 3 | CBS | Norfolk/Newport News/Hampton. | 44 | | | | | | 105 | 39 | | | | |
| Lee Enterprises Inc. | WSAZ-TV | 3 | NBC | Charleston/Huntington | 33 | 124 | 119 | 58 | 71 | 139 | 5 | 139 | 91 | KGLO-AM (Mason City, Ia.)<br>KGLO-TV "<br>KEYC-TV (Mankato, Mn.)<br>KEYC-FM "<br>KHQA-TV (Hannibal, Mo.)<br>WTAD-AM (Quincy, Il.)<br>WTAD-FM "<br>WMDR-FM (Moline, Il.)<br>KFAB-AM-FM (Omaha) | Various daily newspapers in Iowa, Illinois, Wisconsin, Nebraska, Montana, and Oregon | |
| Life & Casualty Insurance Co. (half-owner) | WLAC-TV | 5 | CBS | Nashville | 30 | 86 | 39 | 101 | 114 | 49 | 98 | 85 | 138 | WLAC-FM (Nashville) | | American General Life Insurance Co. |

| | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Lin Broadcasting Corp. | WAVY-TV | 10 | NBC | Norfolk/Newport News/Hampton | 44 | 81 | 121 | 54 | 37 | 84 | 88 | 58 | 20 | WAND-AM (Decatur, Il.)<br>WAND-TV "<br>KAAY-AM (Little Rock)<br>KAAY-FM "<br>KEEL-AM (Shreveport)<br>KEEL-FM "<br>WAKY-AM (Louisville)<br>WBBF-AM (Rochester)<br>WBBF-FM "<br>WIL-AM (St. Louis)<br>WIL-FM "<br>KILT-AM (Houston)<br>KILT-FM " | ---------------- |
| Loyola University | WWL-TV | 4 | CBS | New Orleans | 31 | 11 | 7 | 24 | 72 | 31 | 139 | 99 | 95 | WWL-AM (New Orleans)<br>WWL-FM " | ---------------- |
| McGraw-Hill Inc. | KGTV-TV | 10 | NBC | San Diego... | 49 | 112 | 111 | 102 | 89 | 62 | 79 | 104 | 121 | KERO-TV (Bakersfield) | McGraw-Hill |
| | KMGH-TV | 7 | CBS | Denver...... | 32 | 99 | 44 | 73 | 118 | 98 | 75 | 98 | 51 | | |
| | WRTV-TV | 6 | NBC | Indianapolis | 14 | 37 | 65 | 39 | 40 | 64 | 49 | 44 | 88 | | |
| Mecklenburg Television Broadcasters Inc. | *WCCB-TV | 18 | ABC | Charlotte.... | 35 | 144 | 133 | 129 | 84 | 137 | 133 | 21 | 112 | WKAB-TV (Montgomery)<br>WABG-AM (Greenwood, Ms.)<br>WABG-TV "<br>WOLO-TV (Columbia, S.C.)<br>WBBJ-TV (Jackson. In.)<br>WLBJ-AM (Bowl Green, Ky.)<br>WLBJ-FM "<br>WWOD-AM (Lynchburg, Va.)<br>KXEL-AM (Waterloo, Ia.)<br>KXEL-FM "<br>WDOD-AM (Chattanooga)<br>WDOD-FM "<br>WKIN-AM (Kingsport, In.) | ---------------- |

TABLE 17.—*Ownership Information*—Continued

| Owner | Station(s) | Channel | Affiliation | Market | Mkt. No. | Rank | Local | News | Comm. | Fin. | Min. | Women | PSA | Interest or ownership |  | Other |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
|  |  |  |  |  |  |  |  |  |  |  |  |  |  | Other broadcasting | Publishing |  |
| Media General, Inc. | WFLA-TV | 8 | NBC | Tampa/St. Petersburg | 24 | 127 | 120 | 51 | 134 | 78 | 41 | 113 | 54 | WFLA-AM (Tampa)<br>WFLA-FM " | ---------------- | CATV (Fredericksburg, Va.) |
| Meredith Corp.. | KCMO-TV<br>WHEN-TV | 5<br>5 | CBS<br>CBS | Kansas City<br>Syracuse.... | 23<br>43 | 87<br>108 | 54<br>127 | 69<br>89 | 102<br>90 | 97<br>54 | 61<br>9 | 140<br>64 | 109<br>115 | WHEN-AM (Syracuse)<br>WPHO-AM (Phoenix)<br>WPHO-TV "<br>KCMO-AM (Kansas City)<br>KFMU-FM "<br>WOW-AM (Omaha)<br>WOW-FM "<br>WOW-TV "<br>WNEM-TV (Flint) | *Better Homes and Gardens*<br>*Successful Farming*<br>Appleton-Century Crofts<br>New Century<br>Lyons & Carnahan |  |
| Metromedia..... | KMBC-TV | 9 | ABC | Kansas City | 23 | 135 | 102 | 133 | 94 | 90 | 53 | 5 | 47 | WNEW (New York)<br>WNEW-FM "<br>WNEW-TV "<br>KLAC-AM (Los Angeles)<br>KMET-FM "<br>KTTV-TV "<br>WXIX-TV (Newport, Ky.)<br>WASH-FM (Washington, D.C.)<br>WTTG-TV "<br>WIP-AM (Philadelphia)<br>WMMR-FM "<br>WHK-AM (Cleveland)<br>WOMC-FM (Detroit) | ---------------- | Metromedia Producers Corp.<br>Wolper Pictures Ltd.<br>Wolper Productions, Inc.<br>Ice Capades Inc. |

| | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | | | | | | WMMS-FM (Cleveland)<br>WTCN-TV (Minneapolis)<br>KSAN-FM<br>WCBM-AM (Baltimore)<br>KNEW-AM (Oakland) | | |
| Metropolitan Broadcasting Corp. | KOVR-TV | 13 | ABC | Sacramento/ Stockton | 27 | 44 | 134 | 120 | 20 | 5 | 108 | 131 | 97 | KMJ-AM (Fresno)..<br>KMJ-FM "<br>KMJ-TV "<br>KBEE-AM (Modesto)<br>KBEE-FM "<br>KBFK-AM (Sacramento)<br>KBFK-FM " | Fresno *Bee*....<br>Modesto *Bee*<br>Sacramento *Bee* | **Nor Cal Cablevision Inc.<br>CATV (Oroville, Ca.; Yuba City, Ca.; and 4 franchises) |
| Midcontinent Television | *WCCO-TV | 4 | CBS | Minneapolis/St. Paul | 13 | 84 | 12 | 74 | 139 | 72 | 28 | 29 | 116 | WCCO-AM (Minneapolis) | **Minneapolis *Star and Tribune* Co. | CATV (Rice Lake, Wi.) |
| Midwest Television Inc. | KFMB-TV | 8 | CBS | San Diego... | 49 | 96 | 51 | 20 | 132 | 128 | 71 | 30 | 37 | KFMB-AM (San Diego)<br>KFMB-FM "<br>WMBD-AM (Peoria)<br>WMBD-FM "<br>WMBD-TV "<br>WCIA-TV (Champaign) | **Lindsay-Schaub Newspapers<br>Champaign *News Gazette* | |
| Multimedia Inc. | WFBC-TV | 4 | NBC | Greenville/ Spartanburg/ Asheville | 40 | 72 | 104 | 63 | 14 | 130 | 60 | 36 | 85 | WFBC-AM (Greenville)<br>WFBC-FM "<br>WMAZ-AM (Macon) | Greenville *News Piedmont* | **CATV (Columbus, In.) |
| | WXII-TV | 12 | NBC | Greensboro/ Winston Salem/ High Point | 48 | 63 | 118 | 105 | 29 | 21 | 137 | 26 | 112 | WMAZ-FM "<br>WMAZ-TV "<br>WBIR-AM (Knoxville)<br>WBIR-FM<br>WBIR-TV "<br>WWNC-AM (Asheville) | Asheville *Citizen Times*<br>Montgomery *Advertiser*<br>Alabama *Journal* | |

TABLE 17.—*Ownership Information*—Continued

| Owner | Station(s) | Channel | Affiliation | Market | Mkt. No. | Rank | Local | News | Comm. | Fin. | Min. | Women | PSA | Interest or ownership: Other broadcasting | Interest or ownership: Publishing | Other |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Newhouse Broadcasting Corp. | KOIN-TV | 6 | CBS | Portland | 26 | 21 | 84 | 29 | 59 | 12 | 27 | 89 | 5 | WSYR-AM (Syracuse)<br>WSYR-FM "<br>WAPI-AM (Birmingham)<br>WAPI-FM "<br>WTPA-FM (Harrisburg)<br>WTPA-TV "<br>WSYE-TV (Elmira-Corning)<br>KOIN-AM (Portland)<br>KOIN-FM " | **Denver *Post*<br>Jersey City *Journal*<br>Newark *Star-Ledger*<br>Long Press and *Star Journal*<br>Staten Island *Advance*<br>*News and Sunday Republican*<br>*Vogue*<br>*Mademoiselle*<br>*Glamour*<br>*House & Garden* | CATV (Anniston, Al. Carthage, N.Y.; Corning, N.Y.; Delhi, N.Y.; Malone, N.Y.; Messena, N.Y.; Ogdensburg, N.Y.; Oneonta, N.Y.; Rome, N.Y.; Sidney, N.Y.; and 13 others in New York |
| | KTVI-TV | 2 | ABC | St. Louis | 12 | 68 | 86 | 140 | 26 | 19 | 78 | 146 | 137 | | | |
| | WAPI-TV | 13 | NBC | Birmingham | 38 | 52 | 126 | 46 | 17 | 63 | 143 | 129 | 17 | | | |
| | WSYR-TV | 3 | NBC | Syracuse | 43 | 47 | 117 | 127 | 13 | 10 | 14 | 143 | 17 | | | |
| New York Times Company | WREC-TV | 3 | CBS | Memphis | 29 | 128 | 131 | 108 | 58 | 114 | 109 | 111 | 130 | *WREC-AM (Memphis)<br>*WQXR-AM (New York)<br>*WQXR-FM " | New York *Times*<br>Chattanooga *Times* | |
| NTL Corp. | *WSM-TV | 4 | NBC | Nashville | 30 | 28 | 24 | 97 | 67 | 16 | 129 | 54 | 142 | *WSM-AM (Nashville)<br>*WSM-FM " | ............... | Third National Bank of Nashville |
| Orion Broadcasting Co. | WAVE-TV | 3 | NBC | Louisville | 36 | 106 | 95 | 85 | 92 | 86 | 64 | 127 | 83 | WAVE-AM (Louisville)<br>WMT-AM (Cedar Rapids)<br>WMT-FM "<br>WMT-TV "<br>WFIE-TV (Evansville, In.)<br>WJMN-TV (Escanaba, Mi.) | ............... | CATV (Grand Rapids, Mi.; St. Peter, Mn. |

| | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | | | | | WFRV-TV (Green Bay) | | |
| Outlet Co....... | KSAT-TV | 12 | ABC | San Antonio | 45 | 78 | 90 | 131 | 28 | 38 | 118 | 48 | 128 | WJAR-AM (Providence) | ................ | Retail department stores |
| | WJAR-TV | 10 | NBC | Providence.. | 34 | 94 | 114 | 47 | 70 | 91 | 35 | 144 | 7 | WDBO-AM (Orlando) | | |
| | **WNYS-TV | 9 | ABC | Syracuse.... | 43 | 107 | 144 | 143 | 8 | 18 | 2 | 102 | 73 | WDBO-FM "<br>WDBO-TV " | | |
| Overmeyer Inc. | WDHO-TV | 24 | ABC | Toledo...... | 45 | 100 | 139 | 144 | 7 | 29 | 142 | 31 | 117 | WXIX-TV (Cincinnati)<br>WPGH-TV (Pittsburgh)<br>KEMO-TV (San Francisco)<br>WATL-TV (Atlanta)<br>KDJO-TV (Rosenberg, Tx.) | ................ | |
| Pacific and Southern Broadcasting Co. | WQXI-TV | 11 | ABC | Atlanta..... | 17 | 143 | 129 | 126 | 112 | 99 | 75 | 23 | 44 | WQXI-AM (Atlanta)<br>WQXI-FM "<br>WSAI-AM (Cincinnati)<br>WSAI-FM "<br>KHON-TV (Honolulu)<br>KHAW-TV (Hilo, H.)<br>KAII-TV (Wailuku, H.)<br>KKDJ-EM (Los Angeles)<br>WWDJ-AM (Hackensack)<br>KIMN-AM (Denver)<br>KYXI-AM (Oregon City, Ore.) | ................ | |
| Peninsula Broadcasting Corp. | WVEC-TV | 13 | ABC | Norfolk/ Newport News/ Hampton | 44 | 137 | 137 | 135 | 42 | 95 | 141 | 40 | 91 | WVEC-AM (Hampton, Va.)<br>WVEC-FM " | ................ | CATV (Ahoskie, N.C.; Morfreesburg, N.C.; Emporia, Va.; and 5 others) |

TABLE 17.—*Ownership Information*—Continued

| Owner | Station(s) | Channel | Affiliation | Market | Mkt. No. | Rank | Local | News | Comm. | Fin. | Min. | Women | PSA | Interest or ownership: Other broadcasting | Interest or ownership: Publishing | Other |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Plains Television Corp. | *WHNB-TV | 30 | NBC | Hartford/New Haven | 22 | 103 | 116 | 23 | 64 | 136 | 69 | 78 | 144 | WICS-AM (Springfield, Il.)<br>WICD-AM (Champaign, Il.) | ---------------- | CATV (Muskegon, Mi.; Mechanicsburg, Pa.; and Richmond, In.) |
| Poole Broadcasting Corp. | *WPRI-TV | 12 | CBS | Providence | 34 | 51 | 115 | 94 | 3 | 113 | 3 | 91 | 105 | WJRT-TV (Flint) | ---------------- | |
| | *WTEN-TV | 10 | CBS | Albany/Schenectady/Troy | 37 | 90 | 110 | 103 | 76 | 39 | 20 | 120 | 52 | *WTEN-AM (Albany)<br>*WCDC-AM (Adams, Ma.) | ---------------- | |
| Pulitzer Publishing Co. | KSD-TV | 5 | NBC | St. Louis | 12 | 66 | 36 | 68 | 74 | 108 | 121 | 83 | 45 | KSD-AM (St. Louis)<br>KVOA-TV (Tucson)<br>KOAT-TV (Albuquerque) | St. Louis *Post-Dispatch* | CATV (Clayton, Mo.) |
| Rahall Communications Corp. | *WLCY-TV | 10 | ABC | Tampa/St. Petersburg | 24 | 70 | 61 | 44 | 86 | 96 | 140 | 137 | 4 | WLCY-AM (St. Petersburg)<br>WLCY-FM "<br>WFBM-AM (Indianapolis)<br>WFBM-FM "<br>WKAP-AM (Allentown, Pa.)<br>WWNR-AM (Beckley, W.Va.) | ---------------- | CATV (Hillsborough, Fl.) |
| RCA | KNBC-TV | 4 | NBC | Los Angeles | 2 | 14 | 3 | 3 | 138 | 35 | 54 | 38 | 99 | WNBC-AM (New York)<br>WNBC-FM "<br>WRC-AM (Washington)<br>WRC-FM "<br>WMAQ-AM (Chicago)<br>WMAQ-FM "<br>WKYC-AM (Cleveland)<br>WKYC-FM "<br>KNBC-FM (Los Angeles) | Random House | RCA Global Communications<br>RCA International Service Corp.<br>RCA Institutes Inc.<br>RCA Sales Corp.<br>RCA Distributing Corp. |
| | WKYC-TV | 3 | NBC | Cleveland | 7 | 116 | 113 | 86 | 126 | 43 | 26 | 67 | 88 | | | |
| | WMAQ-TV | 5 | NBC | Chicago | 3 | 43 | 41 | 2 | 136 | 74 | 51 | 41 | 101 | | | |
| | WNBC-TV | 4 | NBC | New York City | 1 | 39 | 60 | 17 | 97 | 58 | 67 | 17 | 65 | | | |
| | WRC-TV | 4 | NBC | Washington | 10 | 12 | 49 | 15 | 103 | 7 | 43 | 66 | 96 | | | |

| | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | | | | | | KNBR-AM (San Francisco)<br>WJAS-AM (Pittsburgh) | | Hertz Corp. |
| Reeves Telecom. Corp. | WHTN-TV | 13 | ABC | Charleston/ Huntington | 33 | 110 | a | 107 | 19 | 102 | 8 | 12 | 59 | WITH-AM (Baltimore)<br>WITH-FM "<br>WKEE-AM (Huntington)<br>WKEE-FM "<br>WBLG-TV (Lexington) | --------------- | TelePrompTer Corp.<br>CATV (owns 127 systems; partially owns 6 other systems; holds 29 other franchises)<br>Owns 80% of Marcus CATV Corp. & Parker Industries Inc.<br>Owns 50% of Theta Cable<br>Owns TelePrompTer Transmission of Kansas Inc.<br>Owns Intermountain Microwave of Montana<br>Owns TelePrompTer Transmission of New Mexico<br>Owns TelePrompTer Transmission of Oregon Inc.<br>Theta Communications<br>Muzak Corp. |

TABLE 17.—*Ownership Information*—Continued

| Owner | Station(s) | Channel | Affiliation | Market | Mkt. No. | Rank | Local | News | Comm. | Fin. | Min. | Women | PSA | Interest or ownership | | Other |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | | | | | | Other broadcasting | Publishing | |
| RKO General Inc. | WHBQ-TV | 13 | ABC | Memphis | 29 | 141 | 138 | 139 | 52 | 111 | 110 | 119 | 134 | KHJ-AM (Los Angeles)<br>KRTH-FM "<br>WOR-TV (New York)<br>WOR-AM "<br>WXLO-FM "<br>WHBQ-AM (Memphis)<br>WHBQ-FM "<br>WRKO-AM (Boston)<br>WGMS-AM (Bethesda)<br>WGMS-FM (Bethesda)<br>KKEE-AM (San Francisco)<br>KFRC-FM (San Francisco) | ........ | RKO Radio Pictures<br>RKO Stanley Warner Theaters Inc.<br>General Tire and Rubber Co.<br>Cablecom-General Inc. CATV (owns 40 systems and partly-owns 12 others; holds 100% of 3 other franchises and controlling interest in 11 others)<br>*Mountain States Video Inc. CATV (20 franchises) |
| | WNAC-TV | 7 | ABC | Boston | 6 | 17 | 37 | 41 | 27 | 59 | 19 | 112 | 22 | | | |
| Rollins Inc. | WCHS-TV | 8 | CBS | Charleston/Huntington | 33 | 121 | 85 | 132 | 24 | 140 | 10 | 60 | 69 | WCHS-AM (Charleston)<br>WEAR-TV (Pensacola)<br>WPTV-TV (North Pole, N.Y.)<br>WBEE-AM (Harvey, Il.)<br>WAMS-AM (Wilmington)<br>WRAP-AM (Norfolk)<br>KDAY-AM (Santa Monica) | ........ | CATV (Wilmington, De.) |

| | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Sripps-Howard Broadcasting Corp. | WCPO-TV | 9 | CBS | Cincinnati.. | 20 | 42 | 40 | 49 | 98 | 33 | 127 | 108 | 127 | WMC-AM (Memphis)<br>WMC-FM "<br>WPTV-TV (West Palm Beach)<br>KTEW-TV (Tulsa)<br>WNOX-AM (Knoxville) | Scripps-Howard Newspapers (Pittsburgh *Press;* Cleveland *Press;* Cincinnati *Post* and *Times-Star;* Knoxville *News Sentinel;* Fort Worth *Press;* Albuquerque *Tribune*) *World Almanac* | |
| | WEWS-TV | 5 | ABC | Cleveland... | 7 | 125 | 92 | 134 | 100 | 56 | 107 | 138 | 124 | | | |
| | WMC-TV | 5 | NBC | Memphis.... | 29 | 89 | 38 | 80 | 115 | 92 | 136 | 96 | 100 | | | |
| Sounderling Broadcasting Corp. | WAST-TV | 13 | ABC | Albany/ Schenectady/ Troy | 37 | 30 | 135 | 119 | 9 | 4 | 12 | 11 | 48 | KFOX-AM (Long Beach)<br>KFOX-FM "<br>WWRL-AM (New York)<br>WOPA-AM (Oak Park, Il.)<br>WGLD-FM "<br>KDIA-AM (Oakland)<br>WDIA-AM (Memphis)<br>WAID-FM "<br>WOL-AM (Washington)<br>WMOD-FM " | | SBC Management Corp.<br>Modern Teleservices Inc.<br>Bernard Howard & Co. |
| | WLKY-TV | 32 | ABC | Louisville... | 36 | 92 | 136 | 142 | 11 | 23 | 84 | 4 | 130 | | | |
| Southern Broadcasting Co., Inc. | **WBMG-TV | 42 | CBS | Birmingham | 38 | 139 | 125 | 117 | 50 | 143 | 118 | 103 | 119 | **WBMG-AM (Birmingham)<br>KULF-AM (Houston)<br>WRVA-AM (Richmond)<br>WRVQ-FM "<br>KOY-AM (Phoenix)<br>WTOB-AM (Winston-Salem)<br>WKIX-AM (Raleigh)<br>WYYD-FM "<br>WSGN-AM (Birmingham) | | |
| | WGHP-TV | 8 | ABC | Greensboro/ Winston-Salem/ High Point | 48 | | | | | | 39 | 7 | | | | |

TABLE 17.—*Ownership Information*—Continued

| Owner | Station(s) | Channel | Affiliation | Market | Mkt. No. | Rank | Local | News | Comm. | Fin. | Min. | Women | PSA | Interest or ownership |  | Other |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
|  |  |  |  |  |  |  |  |  |  |  |  |  |  | Other broadcasting | Publishing |  |
| Spartan Broadcasting Corp. | WSPA-TV | 7 | CBS | Greenville/Spartanburg/Asheville | 40 | 129 | 103 | 57 | 117 | 121 | 74 | 101 | 104 | WSPA-AM (Spartanburg, S.C.)<br>WSPA-FM "<br>WTHO-AM (Thomson, Ga.)<br>WTHO-FM " | ---------------- |  |
| Springfield Television Broadcasting Corp. | WKEF-TV | 22 | ABC | Dayton | 39 | ---------- | ---------- | ---------- | ---------- | ---------- | ---------- | ---------- | ---------- | WWLP-TV (Springfield, Ma.)<br>WRLP-AM (Greenfield, Ma.)<br>WRLP-TV " |  |  |
| Standard Corp. | *KUTV-TV | 2 | NBC | Salt Lake City | 50 | 53 | 83 | 104 | 63 | 11 | 144 | 94 | 106 | ---------------- | Ogden *Standard*<br>*Salt Lake *Tribune* |  |
| Storer Broadcasting Co. | WAGA-TV | 5 | CBS | Atlanta | 17 | 60 | 70 | 5 | 124 | 79 | 71 | 126 | 100 | WDEE-AM (Detroit) | ---------------- | Northeast Airlines<br>CATV (20 systems in California and 3 systems in Florida; 3 additional franchises in California and 3 in Florida) |
|  | WITI-TV | 6 | ABC | Milwaukee | 21 | 45 | 72 | 111 | 22 | 41 | 93 | 69 | 120 |  |  |  |
|  | WJBK-TV | 2 | CBS | Detroit | 5 | 133 | 93 | 99 | 116 | 106 | 40 | 132 | 132 | WSBK-TV (Boston) |  |  |
|  | WJW-TV | 8 | CBS | Cleveland | 7 | 77 | 69 | 43 | 104 | 77 | 52 | 128 | 71 | WSPD-AM (Toledo) |  |  |
|  | WSPD-TV | 13 | NBC | Toledo | 45 | 119 | 124 | 113 | 41 | 107 | 54 | 142 | 108 | WJW-AM (Cleveland)<br>WPNA-FM (Philadelphia)<br>KGBS-AM (Los Angeles)<br>KGBS-FM "<br>WGBS-AM (Miami)<br>WHN-AM (New York) |  |  |
| Sunbeam | WCKT-TV | 7 | NBC | Miami | 18 | 56 | 71 | 27 | 46 | 117 | 123 | 47 | 45 |  |  |  |
| Synercom Communications Corp. | WZZM-TV | 7 | ABC | Kalamazoo/Grand Rapids | 41 | 35 | 112 | 45 | 43 | 14 | 22 | 133 | 24 | WZZM-FM (Kalamazoo/Grand Rapids) |  |  |

| | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Taft Broadcasting Co. | WBRC-TV | 6 | ABC | Birmingham | 38 | 49 | 23 | 12 | 51 | 144 | 121 | 55 | 81 | WKKQ-FM (Cincinnati) | ........ | |
| | WDAF-TV | 4 | NBC | Kansas City | 23 | 134 | 34 | 72 | 144 | 131 | 103 | 135 | 81 | WKRC-AM " | | |
| | WGR-TV | 2 | NBC | Buffalo...... | 25 | 123 | 141 | 109 | 45 | 81 | 29 | 79 | 25 | WTVN-AM (Columbus) | | |
| | WKRC-TV | 12 | ABC | Cincinnati.. | 20 | 120 | 74 | 138 | 34 | 133 | 30 | 86 | 41 | WTVN-FM | | |
| | WTVN-TV | 6 | ABC | Columbus... | 28 | 136 | 128 | 130 | 68 | 105 | 18 | 46 | 76 | WBRC-AM (Birmingham)<br>WBRC-FM "<br>WGR-AM (Buffalo)<br>WGR-FM "<br>WDAF-AM (Kansas City)<br>WDAF-FM "<br>WNEP-TV (Wilkes-Barre) | | |
| Time, Inc....... | WOTV-TV | 8 | NBC | Kalamazoo/Grand Rapids | 41 | 62 | 48 | 37 | 106 | 67 | 16 | 145 | 74 | KOGO-FM (San Diego) | *Time, Fortune, Sports Illustrated, Money* magazines<br>Time-Life Books | |
| Times Mirror Corp. | KDFW-TV | 4 | CBS | Dallas-Fort Worth | 11 | 101 | 26 | 34 | 125 | 141 | 80 | 49 | 45 | ........ | Dallas *Times-Herald*<br>*Newsday*<br>Los Angeles *Times*<br>Orange Coast *Daily Pilot* | **Church of Jesus Christ of Latter Day Saints (see Bonneville International Corp.)<br>T-M Communication Co. CATV (23 systems in California, New York, and Florida; 4 franchises in California and 3 in Florida) |
| Travelers Corp.. | WTIC-TV | 3 | CBS | Hartford-New Haven | 22 | 16 | 68 | 28 | 5 | 110 | 48 | 42 | 13 | WTIC-AM (Hartford-New Haven)<br>WTIC-FM " | ........ | |
| 20th Century Fox | KMSP-TV | 9 | ABC | Minneapolis-St. Paul | 13 | 122 | 109 | 141 | 15 | 126 | 147 | 43 | 122 | ........ | ........ | 20th Century Fox Film Corp. |

TABLE 17.—*Ownership Information*—Continued

| Owner | Station(s) | Channel | Affiliation | Market | Mkt. No. | Rank | Local | News | Comm. | Fin. | Min. | Women | PSA | Interest or ownership | | Other |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | | | | | | Other broadcasting | Publishing | |
| Washington Post Co., Inc. | WPLG-TV | 10 | ABC | Miami | 18 | 6 | 10 | 1 | 87 | 52 | 126 | 19 | 56 | WTOP-AM (Washington, D.C.) | *Newsweek*<br>Washington *Post* | Home Theater Network Co. (pay TV) |
| | WTOP-TV | 9 | CBS | Washington, D.C. | 10 | 55 | 79 | 10 | 120 | 50 | 66 | 3 | 40 | WTOP-FM "<br>WJXT-AM (Jacksonville)<br>WJXT-TV "<br>WCKY-AM (Cincinnati) | | |
| Westinghouse Corp. | KDKA-TV | 2 | CBS | Pittsburgh | 9 | 4 | 4 | 6 | 30 | 57 | 11 | 125 | 9 | WBZ-AM (Boston) | | Manufacturing of home appliances; electronic equipment for industry apparatus for the generation, transmission, and utilization of electricity, including that developed through atomic energy<br>CATV (Panama City, Fla., Tallahassee, Fla., Dublin, Ga., Milledgeville, Ga., Swamsboro, Ga., Thomasville, Ga., Voldosta, Ga., **Bronx, N.Y.) |
| | KPIX-TV | 5 | CBS | San Francisco | 8 | 1 | 31 | 13 | 1 | 103 | 58 | 53 | 14 | WBZ-FM " | | |
| | KYW-TV | 3 | NBC | Philadelphia | 4 | 5 | 2 | 7 | 23 | 123 | 73 | 70 | 3 | KYW-AM (Philadelphia) | | |
| | WBZ-TV | 4 | NBC | Boston | 6 | 31 | 15 | 16 | 55 | 138 | 4 | 24 | 17 | | | |
| | WJZ-TV | 13 | ABC | Baltimore | 19 | 2 | 6 | 59 | 4 | 24 | 128 | 57 | 2 | KDKA-AM (Pittsburgh)<br>KDKA-FM "<br>WINS-AM (New York)<br>WOWO-AM (Ft. Wayne)<br>WIND-AM (Chicago)<br>KFWB-AM (Los Angeles) | | |

| | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| WGAL-TV, Inc. | WTEV-TV | 6 | ABC | Providence | 34 | 88 | 130 | 110 | 48 | 32 | 1 | 80 | 33 | WGAL-TV (Lancaster) | --------------- | CATV (franchise in Lynn Haven, Fla.)<br>Closed Circuit (Micro-Relay Inc.) |
| WHAS, Inc. | WHNS-TV | 11 | CBS | Louisville | 36 | 19 | 35 | 84 | 33 | 20 | 131 | 130 | 65 | WHAS-AM (Louisville)<br>WHAS-FM (Louisville) | --------------- | |
| WKY Television System Inc. (licensee) | WKY-TV | 4 | NBC | Oklahoma City | 41 | 29 | 16 | 78 | 38 | 70 | 46 | 118 | 1 | WVTV-TV (Milwaukee)<br>WKY-AM (Oklahoma City)<br>KTVT-TV (Dallas-Ft. Worth)<br>KHTV-TV (Houston) | Oklahoma Pub. Co., *Daily* and *Sunday Oklahoman*, Oklahoma City *Times* plus occas'l other printed materials | |
| | WTVT-TV | 13 | CBS | Tampa-St. Petersburg | 24 | 80 | 80 | 32 | 119 | 51 | 100 | 121 | 6 | | | |
| Wometco Enterprises Inc. | WLOS-TV | 13 | ABC | Greenville-Spartanburg-Asheville | 40 | 111 | 143 | 137 | 12 | 60 | 50 | 59 | 125 | WLOS-AM (Greenville, N.C.)<br>KVOS-TV (Bellingham, Wa.) | --------------- | Automatic food and refreshment vending; industrial food service; chain of restaurants;<br>chain of motion picture theaters;<br>film production and processing; TV slide production; closed circuit TV; outdoor advertising<br>Miami Seaquarium<br>CATV (Thibodaux, La., East Brunswick, N.J., Keeseville, N.Y., Plattsburg, N.Y.) |
| | WTVJ-TV | 4 | CBS | Miami | 18 | 66 | 105 | 87 | 35 | 46 | 115 | 14 | 112 | | | |

# Chapter 4

## HOW YOU CAN IMPROVE TELEVISION IN YOUR COMMUNITY

### I. WHAT CAN YOU DO?

Now that you better understand how the quality of television broadcasting in your community compares to service provided in other markets, you may have other questions. One of these is probably where to go from here. In this chapter we will attempt to answer that question, explaining just how you can use the results of our report, as well as ways in which you can expand on our information within your own community.

Most citizens today believe that television broadcasters have an absolute right to program by whim, to present to millions of daily viewers whatever they might choose, in whatever sequence, at whatever time. But while that may be the heritage of American television, it most certainly is not the law. The law, in fact, is just the opposite. Our system of broadcasting was established pursuant to a statute that clearly provides that radio and television belong not to any businessman but rather to the public. A television station can only lawfully operate by serving the needs of its audience. The Supreme Court recently emphasized this view in ruling that "it is the right of the viewers and listeners, not the right of the broadcasters which is paramount."[1] The Federal Communications Commission in Washington is authorized and directed to enforce this concept of public service, but as you have seen from our study, in many cases its enforcement has not been as thorough as we—the viewing public—have a right to demand.

Precisely how do we go about demanding our rights as the "public" for whose "interest, convenience or necessity" the broadcast licensee is supposed to operate?[2] In the first place, there are a set of procedures within the Commission's regulatory process that have always been available for public input, although they were never adequately used until Dr. Everett Parker, Director of Communications of the United Church of Christ, convinced the D.C. Circuit Court of Appeals to reverse the Commission's policy of excluding the public in a case involving a television license renewal in Jackson, Mississippi.[3] That case—perhaps the most significant landmark thus far in the area of citizen involvement in the regulatory process—eventually resulted in the refusal of the Commission to renew the license of the Lamar Life Broadcasting Company for WLBT-TV, Jackson, Mississippi, at least partly on the basis of racial discrimination in programming and employment. Later, in *WHDH, Inc.*,[4] the television license held by a Boston newspaper, the *Herald Traveler*, was awarded to a competing applicant partially composed of leaders of various community groups, whose proposed programming carefully took into consideration the needs of the entire Boston viewing community.[5] Current FCC Chairman Dean Burch, in a speech before the NAB, has called *WHDH* "a mistake we aren't likely to repeat soon;"[6] nevertheless, it has established a precedent for license challenges that will not be taken nearly so lightly by licensees, *whatever* the "reassurances" of Chairman Burch.

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[1] *Red Lion Broadcasting Co. v. Federal Communications Commission*, 395 U.S. 367 at 390 (1969).

[2] As we have noted before, that language was made an irrevocable part of each licensee's obligation by the Communications Act of 1934, 47 U.S.C. § 309(a).

[3] *Office of Communication of the United Church of Christ v. Federal Communications Commission*, 359 F. 2d 994 (D.C. Cir. 1969).

[4] *WHDH, Inc.*, 16 FCC 2d 1 (1969).

Besides these *major* successful efforts at broadcasting reform, involving many years of litigation and thousands of dollars of expenses, there have, in recent years, been scores of smaller achievements by citizens and community groups in the constant battle to upgrade the quality of television broadcasting. Those have included reforms in programming practices, employment practices, concentration of control and other areas of local concern, and have often been brought about by pressures, publicity and negotiations in the community itself, completely outside the regulatory structure and jurisdiction of the FCC. But there have been many failures as well, due in part to lack of adequate citizen preparation for the herculean task of taking on the broadcaster. Many more intolerable situations remain unremedied because groups that *could* be exerting influence simply do not know how to do it effectively.

In this chapter, then, we will try to tell you how to use the information in this report, how best to use the additional information and techniques that will be available to you in your own community, and where to turn for more complete assistance than we can provide. We can only outline here the approaches we feel are the most potentially effective. But there are others who stand waiting to aid you in considerably greater detail if you choose to make a fight of your discontent with the inadequacy of the licensees in your community.

Although Congress and the FCC has promulgated a number of specific standards that a broadcaster theoretically is charged with maintaining, you should not assume that your grievance with your local station is hopeless merely because it does not fit neatly into one of those pigeonholes.[7] Explicitly a part of the license of every broadcaster is his statutory mandate to operate in the "public interest," and the Supreme Court long ago held, in an opinion by Justice Frankfurter, that the "public interest standard is a *broad* one to be generously interpreted." The Commission, Frankfurter cautioned, was not to be merely a "traffic policeman" concerned with the technical aspects of broadcast regulation, but was to have a wide regulatory flexibility in determining the outer limits of the concept of the public interest.[8]

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[5] The license was, in fact, taken away from WHDH for reasons that included the licensee's relationship with its commonly owned newspaper, the Boston Herald Traveler, its de facto transfer of control, and its essentially absentee ownership. The incumbent's programming was held not to be a factor unless it has been "either quite good or very poor, [thus giving] some indication of unusual performance in the future." Thus, the Commission allowed itself to weigh the "average" expectations for future WHDH, Inc. programming against the civic-minded proposals of BBI, Inc., the challenging group. The latter was granted the license. See 16 FCC 2d, 8–9, 15–17.

[6] Speech delivered Wednesday, March 28, 1973, to the NAB National Convention.

[7] Some of those might include the fairness doctrine, overcommercialization, racial discrimination, or violation of rules pertaining to lotteries or personal attacks, and so forth.

[8] *National Broadcasting Company* v. *United States,* 319 U.S. 190, at 215 (1943).

Nevertheless, the current bias of the FCC is sufficiently pro-industry that your complaint or petition will have a much greater chance of success if it relates to one of the established guidelines, which we will develop in greater detail below. For the moment, you should think of the following requirements: Broadcasters are required to ascertain the needs of a cross section of their audiences and to program with respect to these needs.[9] They must be fair in handling controversial issues of public importance.[10] They cannot discriminate in hiring and employment.[11] They are fully responsible for the advertising they broadcast.[12] Consolidation of ownership and control of the media (newspapers and broadcasting stations) is not unlawful, but is disfavored in the belief that it threatens the range of information available to the public.[13] Finally, there are some specific restrictions on such practices as broadcasting to defraud or coerce.[14]

You, as members of the public, have a number of different ways in which you can enforce these broadcaster obligations, as well as the more general requirements of the public interest. Short of formal legal actions, you can deal with shortcomings of the television stations in your community by publicizing them via public relations campaigns, picketing, boycotts, moving a large number of citizens to complain, or by establishing a sufficient power base in your community to force a licensee to negotiate an agreement to upgrade his below-standard practices (if only out of fear of more serious legal challenges).

If these methods fail, there are more formalized legal procedures you can follow, including general complaints to the FCC, "fairness doctrine" complaints, petitions to deny the broadcaster's application for renewal of his license, and (although this requires the backing of more substantial moneyed interests) the WHDH style of "competing application" for the broadcaster's facilities. Citizens may also have significant input into the FCC rulemaking procedure, including (but not limited to) the filing of requests for Commission changes in its rules. This was the route chosen by the group called "Action for Children's Television."

Several overriding general principles deserve additional emphasis. In any of these actions you must know your facts thoroughly so that your position appears as well-reasoned and reasonable as possible, and you won't be shaken by station managers' threats or public relations rhetoric. Know precisely what it is you are trying to achieve. Don't muddy the issue with overly broad demands. Try to involve as many community groups as possible, so that you can move in a unified front with a maximum power base. Strengthen your "informal" bargaining position and support your public relations and education initiatives by showing a willingness and an ability to plot a legal course. Finally, always be aware of all the options. A complaint can be a very effective means of enforcing a specific standard, but in some cases a letter-writing campaign will actually accomplish the purpose of your complaint. On the other hand, a letterwriting campaign is often more effective if you can convincingly threaten a petition to deny. Do you understand all the alternatives? Remember, a petition to deny by a citizen group with a good power base potentially sends the broadcaster down an arduous and expensive road during which he risks some chance of loss of the station. In many cases this alone will strongly influence the broadcaster to settle your grievance "out of court." But don't use this procedure frivolously, because it wastes everyone's time, energy and money, and gives legitimate demands for reform a bad name. There are enough *serious* failings in most television licensees today that the few who are doing well should be allowed a little breathing space. Remember, we've identified the *best* stations in the country in this report as well as the worst.

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[9] *Primer on the Ascertainment of Community Problems by Broadcast Applicants*, 27 FCC 2d 650 (1971).

[10] *Report on Editorializing by Broadcast Licensees*, 13 FCC 1246 (1949). *See also Applicability of Fairness Doctrine in the Handling of Controversial Issues of Public Importance* (the "Fairness Primer"), 40 FCC 598 (1964).

[11] 47 C.F.R. § 73.680. *See* discussion of employment rules in Chapter 2 of this Report.

[12] The FCC does not directly regulate the content of commercials, but the Federal Trade Commission will consider complaints about false and misleading advertising against the advertiser (rather than the licensee). For a discussion of FCC "standards" of over-commercialization see the appropriate section of Chapter 1 of this Report.

[13] *See WHDH, Inc., supra* note 4. See also the discussion of Commission ownership rules in Chapter 3 of this Report.

[14] Specific provisions of the Act or Rules forbid such practices as rigging contests, 47 U.S.C. § 509, accepting payola, 47 U.S.C. § 508, broadcast of lotteries, 47 C.F.R. § 73.656, or fraudulent billing, 47 C.F.R. § 73.678.

## II. HOW DO YOU PREPARE?

Your first step in attempting to upgrade the standards of your local broadcaster should be to acquire "A Guide to Citizen Action in Radio and TV," (Citizen Guide) written by Marsha Prowitt and available without charge from the Office of Communication of the United Church of Christ.[15] It describes FCC programming and performance standards, explains the acknowledged avenues of effective public action, and indicates where to go if you need assistance. It's the best available manual for citizen participation in broadcasting. You might also want to take a look at *How to Talk Back to Your Television Set*.[16] A third source, which lawyers will find particularly useful, is "The Primer on Citizen's Access to the Federal Communications Commission," published by the Citizen's Communications Center in Washington, D.C.[17] Finally, there are helpful materials available from the FCC itself. One of the best is the "Procedural Manual" ("The Public and Broadcasting"), a special issue of the Federal Register of September 29, 1972.[18]

### *A. Your Community Organization*

If you have not already formed a citizen's communication group, there are instructions for doing so in the *Citizen Guide*. In addition, you should check the *Sources* Appendix of this report (Appendix B) for a description of already existing national or regional groups with which you can affiliate or who can provide a model for your local operation. If your primary interest is in children's programming, for example, you should get in touch with ACT (Action for Children's Television); if it is the treatment of minorities in broadcasting, then BEST (Black Efforts for Soul in Television) may be able to guide you.[19] In each case, however, there are other groups in the midst of the fray, and there should be no reason why you or your group should have to go it alone.

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[15] For address, see Appendix B.

[16] Nicholas Johnson, *How to Talk Back to Your Television Set*, Bantam Books (1970).

[17] For address, see Appendix B.

[18] *The Public and Broadcasting: a Procedure Manual*, Federal Register, Vo. 37, No. 190, p. 20510 (September 29, 1972). See also the *Primer on Ascertainment, supra* note 9, and the *Fairness Primer*, supra note 10.

If you are just one concerned citizen, or at most a small group, your next step should be to broaden your base by enlisting the support (and hopefully the resources) of existing groups right in your own community. It may even surprise you how many of them there are, not knowing how to effect changes but as concerned as you about the low quality of broadcast service.

Look, for example, to your local chapter of the NAACP or ACLU. Most cities in the top 50 markets have them, and while the organizations may not be capable of formally endorsing your plans, the individuals involved may well be able to help with the sort of activity you have in mind. See if the National Organization for Women (NOW) or a similar women's rights group exists in your community. Try the membership of the League of Women Voters, or the ever-present variation on the theme of "Committee for Good Government." Look to the campuses of local or regional colleges or universities for interested faculty, students or groups. The journalism classes of the local high school may become convinced to turn your ideas for improving local television into year-long class projects. Churches often have civic action groups. Some labor union locals may be persuaded to take up your banner. Consider Senior Citizen Clubs, as many of the members have considerable leisure time and are often therefore both the greatest victims of the shortcomings of television and the greatest potential source of monitors.

Use your imagination. If television can stand a heap of improving in your community, an awful lot of people are going to be dissatisfied with it. It's up to *you* to find them and let them know that something can be done. If none of the above groups is interested enough to be aroused into action, or when you feel it's necessary to broaden your base, consider the particular shortcomings of *your* broadcasters and find organizations that would have a special interest in them: Does a station's program logs show it runs just sixty public service announcements a week—and mostly at 3:00 in the morning to boot? Very well, call on the local charities, boys clubs and civic organizations and explain to them what broadcasters in other cities are doing for groups like theirs. The same could be done with *local* programming or any other category; the organizational permutations and combinations are bounded only by your inmagination and energy.

Local groups should be convinced that television service should be better for a number of reasons. First, you need demonstrable community support when dealing with the broadcasters and when going before the FCC, if that becomes necessary. Also, broadcasters, like everyone else, begin to get the message once they hear something enough times from enough sources. Community support is also necessary to raise funds for newspaper advertisements, supplies, and other expenses. Moreover, these groups may provide volunteer help for mailings, observation and even (in the face of hard line broadcaster intransigence) "confrontations" via picketing, leafleting, and so forth.

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[19] Address for these and all other groups mentioned may be found in Appendix B.

Finally, here are a few public relations hints on dealing with other people and groups in your community (common sense for the most part, but worth repeating). Work *with*, not *against*, the leaders of others groups in your community; every group of people is going to have a different set of priorities, and the beauty of getting different groups together to improve television service is the broad front on which your broadcaster's actions can be challenged, and *enthusiastically*, by a variety of divergent opinions. In other words, don't try to force your priorities on others, but allow them to find their natural position in your concerted attack, to work *through* the contacts you make, not in spite of them. If the minister or rabbi in one congregation can be convinced by his membership to take up the shortcomings of television in a sermon or in his weekly newsletter it might be more productive than your own direct intercession; allow people to *involve themselves* rather than directing them (except, of course, in the stages of data collection and observation that requires trained guidance). And remember, it will always inure to your benefit to rally a wide range of viewpoints and philosophies to your cause; a *broadcaster* by definition has a special knowledge of *broad* support; he knows when he has it because the rating services tell him so, and he is easily tuned out by small numbers because small numbers have come to mean "no profit." He will know, therefore, when *your* support is broadly based. And while there *are* effective things you can do in a small group (or even as an individual), the clout you will have in the early stages of your observation and negotiation will be considerably greater if broad segments of your entire community are behind you.

### *B. Gathering Information*

Once you and your group have determined, either on your own or through the information provided in this Report, that one or more of the licensees in your community could stand some improvement, your next step is to accumulate information about the broadcaster and his practices from as wide a range of sources as possible. In this section we will briefly discuss each of those sources and suggest ways they can be put to good use.

Basically, there are three major types of research to be done, and each will be covered in turn. They utilize: 1) independently published materials, such as the *TV Factbook*, *TV Guide* and the program logs in your local newspaper; 2) the various types of information on file at the FCC, most of which is also available in the local community in the public file each licensee is required to maintain; and 3) the actual programming practices of the station, as observed and recorded by the members of your group. These three major sources of information may also be augmented by such additional methods as interviewing members of the community (as a check, perhaps, on a station's ascertainment of community problems) or interviewing the broadcasters themselves. You may well discover other methods in your community that are related (or can be adapted) to your specific needs and requirements.

1. The most elementary tools of the citizen's group are the daily or weekly program logs found in *TV Guide* or your local newspaper; they are an important source of information and as good a place as any to begin your analysis of the stations in your community. You will find you can use these logs as a rough check against the information found in the more complete logs filed by the licensee with his renewal application, and a close look at the entire programming week in such a log should reveal some important facts about the station immediately to which you can begin to apply the criteria and standards discussed in the course of this report. It should not be difficult to estimate, from program logs, such factors as the total hours a station broadcasts per week; the extent of a licensee's news programming, including total hours of news per week, news as a per cent of all programming, local/regional news, total local/regional hours of news, local/regional news as a per cent of all news; similarly with public affairs, live programming, local programming, other non-entertainment programming, and the type and amount of different types of programming during prime time.

You can also use *TV Guide*, or some other program log, to begin to analyze types of information that cannot be adduced from a glance at a renewal application. When, for example, is the local news usually run? If it is a network affiliate, does the station normally substitute old movies for the network's public affairs programs? What programs are normally broadcast to children? This procedure should, in fact, become an important step in preparing a list of items with which you eventually hope to confront the broadcaster, and you may even be constrained to analyze such things as the diversity or sameness of programming offered by *all* the stations at one given hour or the practice of a network affiliate in filling his prime time "access" period (does he use tired game shows or innovative local programs)? A word of caution, however: many stations have developed techniques for giving the false impression to viewers (and even to networks) that they are carrying shows (often network public affairs programs) when in fact they intend at the last minute to switch on an old movie. Thus, the *TV Guide* or local newspaper may not give an accurate record of a station's program week, and *must* be checked against your own observation. There is no legal penalty for such last-minute switching—unless, of course, the licensee represents in program logs filed with the FCC (or to the network in question) that he *has carried* a show he has in fact pre-empted. But a pattern of such behavior can clearly be used to fuel the claim that the licensee is operating on principles of self, not public, interest.

Additional information about a licensee can be obtained from the tools of his own trade, including sources like *TV Factbook*, by which advertisers inform themselves of a licensee's audience size, advertising rates and so forth, and *Broadcast Yearbook*, which contains comparable and additional miscellaneous information. Even the reports of the various rating services would be helpful (if you can get them).

2. Your second major source of information will be the files of the FCC in Washington or the "public files" maintained by the local stations in your town.[20] Much of this data will consist of filings of various FCC-required forms, a brief survey of which is given below. For a more complete description of the forms as well as the rules regarding their public inspection, see another publication available from the United Church of Christ, *A Guide to Understanding Broadcast License Applications*, by Ralph M. Jennings.

The following material is available for public inspection at the Federal Communications Commission, primarily in files in the Public Reference Room, located on the second floor at 1919 M Street, N.W., Washington, D.C.: 1) the license renewal applications and related filings for the previous two renewal periods; 2) "history cards" briefly noting the major events, including renewals, assignments and violations, in a station's history; 3) docket files, for those licensees engaged in a hearing on some issue, such as one whose renewal is being challenged or one which is applying for some new or improved facility; 4) employment information; 5) fairness doctrine complaints against a station; 6) ownership information; and 7) files containing petitions for rulemakings affecting the licensees in your community (or television broadcasting in general). This information is available for public inspection between the hours of 8:00 AM and 4:30 PM on working days.

The same application forms, ownership and employment reports, and many types of viewer complaints must, by Commission rules, be made available for public inspection at the station or at some other readily accessible place. In addition, every station must also keep detailed logs of its programming (and every other aspect of its operation as well), with notations made, on a minute by minute basis, for every program, commercial, and psa that has aired. (Logs do *not*, however, contain transcripts of the *contents* of the programs.) The station files a set of these logs for its "composite week" (see definitions at the end of Chapter 1) with its renewal application, and while these logs are destroyed by the FCC after a station's license has been renewed,[21] composite week duplicates must be kept in the station's public file at all times. These logs are of considerable value, since they reveal many facets of a licensee's operation not apparent from the brief summaries and percentages spelled out in the renewal application, or in newspaper TV program guides. An FCC rulemaking may soon make them available to the public for the entire three-year period of the broadcaster's license.[22]

For a number of reasons it is always advisable to expend a considerable effort studying the files available at the local station. First, you will thereby let the broadcaster know that you are concerned with his performance—and that you mean to do a thorough job of studying it. In addition, the information kept at the station is sometimes both more accessible and more complete than that found at the FCC. Finally, in all likelihood you will here encounter your first expression of broadcaster hostility or the evasive tactics with which he will attempt to avoid showing you his file, or to withhold some of it from you as "misplaced" or "not available this week," or generally to intimidate you while you are examining it. This is a useful lesson for you to learn early. Just remember, the law is crystal clear—the files must be conveniently available to you,[23] and if you find they are incomplete or if you are not well received or otherwise denied access by the station, you should *immediately* bring it to the attention of the Complaints and Compliance Division of the FCC, by telephone if necessary, and demand an immediate investigation into the broadcaster's intransigence.[24]

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[20] As required by Commission Rules, 47 C.F.R. § 1.526.

[21] This is done because the FCC claims it lacks storage space for the unwieldy logs, even though the logs would be far more helpful to public interest researchers than the "summaries" of that information that go into the renewal application.

[22] Notice of Proposed Rulemaking in the Matter of Petition for Rulemaking to require broadcast licensees to retain certain program records, Docket No. 19667, FCC 73–23, 38 F.R. 1511, 3 P & F R.R. Current Service 53:353 (January 8, 1973).

The FCC forms themselves should be relatively easy to understand, with the aid of the United Church of Christ manual described above. The license renewal application, Form 303, is the most important application in the file (and the source of most of the quantitative conclusions reached in this Report). For most large television stations, the exhibits attached to it make the 303 a major document indeed, often measured in pounds rather than pages. But while it will be useful and informative to read the numerous exhibits submitted by a broadcaster with his application for renewal (if only because this is the same type of document you might well be challenging the *next* time his license expires), the critical programming information will be contained in just a few short sections.

Section IV–B of form 303 contains the basic information on television program service, and the most important parts of Section IV–B are: Part I, on ascertainment of community needs, Part II, concerning past programming (news, public affairs and other programming are stressed), Part III describing proposed programming, Part IV setting out past commercial practices, and Part V indicating proposed commercial practices.

Each television licensee must also file a form 395 employment report with the FCC every year. These reports focus on the employment of minorities and women and are the source of Chapter 2 of this study. The general policy of equal employment as expressed in the Commission's own rules and policy statements[25] is that no person shall be discriminated against in employment because of race, color, religion, national origin or sex. Form 395 is set up to provide information as to the number of minority (and female) employees relative to the total number of employees in categories such as officials and managers, professionals, laborers and service workers.

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[23] 47 C.F.R. § 1.526. Stations often will attempt to withold part of their files, and especially their composite week program logs. Since these logs enable you to determine how many commercials (for example) are being run during children's programs, or how many of a station's psas are run at 2:00 AM, they are important and must be shown to you; if the licensee does otherwise he risks possible fine for violation of Commission rules.

[24] Local FCC offices will not be of much assistance in matters like this, since they are generally equipped only to handle technical complaints or problems. Inquiries should be addressed directly to Washington.

[25] See general discussion of these rules and policies in Chapter 2.

Each broadcaster must also file ownership reports on form 323. Ownership reports provide detailed information about the licensee's business affairs, his interests outside broadcasting, and various contracts and agreements involving the licensee and his principal employees. New forms are filed whenever there is a change in the required information.

3. The final area of major citizens group research should be the careful observation, monitoring, of the licensee's programming, the one major type of research truly beyond the scope of our particular study. There is a difference, of course, between merely observing a station's programming and actually monitoring it for specific information. How much you do will depend in large measure on how many people you have and how dedicated they are. But you must remember that the more ambitious your goals the greater the attention that will be paid to your final product—and the more difficult it will be to complete with a staff consisting of unpaid volunteers.

The United Church of Christ Office of Communication has made an art of the process of monitoring television stations, even to the point of achieving official FCC recognition in a radio license companion case to *WLBT*, of the equality of a "monitored" week (properly executed) with the Commission's own composite week for the purpose of program analysis.[26] But Dr. Everett Parker's monitors are all carefully trained, and they work in teams that include (for each station) two monitors, two "back up" observers (or supervisors) and one aural tape engineer, all of whom are on duty and recording at all times during the broadcast week under consideration. If you feel the resources of your group are sufficient for such an undertaking, contact Ralph Jennings (in New York) or Jane Goodman (in Washington) for further information about the Church's training techniques.[27]

Many of the same facts can also be gathered with fewer people, with more simple recording forms, and a couple of stopwatches to time commercials, interruptions, program segments, and so forth. Even this process, if you are careful to limit the information you seek, will produce valuable data about the service a licensee is giving, which can always be used to augment data available from other sources as well to adduce significant conclusions that could not otherwise be made.

It is crucial, whether you are monitoring or observing, to know precisely what it is you are looking for, and to have simple forms that can be filled in while the programming is being observed. Again, the United Church of Christ experience should be invaluable in this regard, since it has developed specific forms to satisfy the needs of various types of monitors or observers. A selection of those are attached at the end of this section.

The list of things one *might* look for in this process is almost endless. Your particular interests will no doubt give you some direction. You or your group might well begin by holding one or more sessions in which you all merely observe the programming of the station or stations of interest to you, discuss what you see among yourselves, and don't bother to record any information. It might be useful to include child psychologists, social workers, psychiatrists, and so forth, in these early sessions if they are available to you. Once you break down into smaller units for actual monitoring, the experiences and observations of others in your group will prove invaluable.

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[26] *Lamar Life Insurance Co.*, 38 FCC 1143 (1965).

[27] For addresses see Appendix B.

Even if you are acutely aware of the needs and predilections of your organization, however, you cannot hope to insure accuracy and corroboration of your findings if you attempt to monitor alone. A minimum of two people are required, and they must be spelled every few hours by fresh workers. Many believe a supervisor is necessary to monitor the monitors, and later be available to corroborate the testimony of the monitors as to the procedures used. For even two people working without supervision will have a difficult time of it unless their data recording forms are as simple to use as possible.

You should start the actual process of monitoring with a form that has columns for time of day, name of "program," category of the program (entertainment, news, education, commercial, or psa). What you will be doing is writing down the entire broadcast day from sign-on to sign-off. Or perhaps you will want to start by emphasizing "prime time" (6:00 to 11:00 PM on TV or 5:00 PM to 10:00 PM in some areas). It is important to list name of show, nature of show (is programming category) and duration. You should also include a column in which you indicate whether the show was produced nationally or locally—this is usually done from general knowledge, and by noting the opening and closing credits.

You should plan to monitor for *at least* an entire week—and preferably one in which a degree of programming normalcy can be assumed. You would not, for example, monitor during Christmas week or election week—or the first week of the new fall schedule. In the end you will have amassed a list of all programming offered to the audience by all the stations in your community (or the network affiliates, or others which you have selected for emphasis). If you are comparing all the stations in your community, it is important that you monitor them during the same week so more accurate comparisons can be made.

An important ingredient in your data collection process is the attention paid to time. Use several clocks in your monitoring exercise. If several television sets are to be monitored in one room simultaneously one master clock can serve all monitors, but each individual group should have one or two cumulative stop watches in order to time the separate segments in the broadcast day (this is especially true for shorter segments like commercials and psa's).

In evaluating the performance you will want to compare your findings to what the broadcasters proposed to do in their last license renewal applications. This should be done regardless of the more specific (i.e., black-oriented or children-oriented) programming you are seeking to evaluate, since it will give your effort a wider scope and the broadcasters proposals (from his form 303) are readily available for your inspection. If on the 303 a licensee proposed that 5% of its broadcast week would be devoted to news and public affairs programming, for example, you can easily acquire monitoring data that tells you whether or not the licensee is doing that. If the broadcast day is 10 hours long that means that 30 minutes should have been devoted to that category of programming.

By the same token, you will probably want to add up the amount of programming in each category. If the station was on the air for a total of 130 hours during the week you will want to know the percentage of time devoted to news broadcasts, entertainment shows (variety, "soap operas," game shows, religious programming, commerical messages, public service announcements, or old movies. You will also most likely want to note the percentage of programs locally produced as opposed to those fed directly from the network, those syndicated, or those produced by any source independent of the local station.

In addition to corroborating (or challenging) the proposals and reported categories of the broadcaster's renewal application, you will quickly find that monitoring can also add dimensions to those same categories that would not otherwise be available through inspection of a station file or TV Guide-type program log. Form 303 will tell you how many 60-minute segments of the broadcast week include more than 12 minutes of commercials, but it will not tell you whether those segments occur in the early evening hours, when the majority of people are watching, or during children's programs. Form 303 will tell you how many public service announcements the licensee runs in the course of a week, but it will not tell you when they are run (are they bunched together between old movies at 2:30 in the morning?), or how long they are (some psa's are just 10 seconds long—or less), or how responsive they are to local needs (as distinguished from Army recruiting spots, or Red Cross appeals). As you can see, the dimensions for analysis are virtually endless, if the monitoring is done in sufficient detail. By putting it all together you will be able to obtain a far more precise view of your broadcasters' performance than is available even in a report of this magnitude, which surveys all the material available at the FCC.

What else should you specifically look for in monitoring a station's performance? The *Citizen Guide* asks several questions which monitoring and other information gathering will help answer: Has each station lived up to the promises made in its license application? Has each station properly ascertained the needs and interests of the entire community? Do the programs offered truly respond to the needs of the community as identified on the license renewal application? Is fair employment opportunity reflected in the station's employment figures or only in policy statements?

In the few paragraphs that follow, we will attempt to set out a few of the many specific things you can look for—in doing so, we hope to spur you on to develop a more precise list well attuned to the needs and shortcomings in your own community.

You might start, for example, with commercialization. Although the license renewal application tells you little that is specific, it is important to know how many commercial *minutes* per hour are being shown during prime time, or during children's time on Saturday and

Sunday morning. In addition, you might look for the *frequency* of commercials and of program interruptions. (It's not just the minutes of commercials that is annoying, it's the *number* of non-program announcements, and the number of program interruptions.) How many commercials are for *local* businesses (thereby providing at least something remotely in the nature of a local service) and how many simply for national products? How deceptive are the broadcaster's "station break" policies? (Does the station announce "Beat Your Wife will be right back after station identification"—and then break for six commercials?) What products are being advertised to children? To adults?

You can perform a similar analysis with public service announcements. When are they shown? What is their subject matter (are they of local interest)? Are they stale (from the station's ever-handy library) or topical? Do most of a station's psa's come from the same source—i.e., the Advertising Council (which is a rather conservative group of advertisers with a virtual monopoly on the psa "business"), or the U.S. Government?

Analyze the news in equal depth. Instead of just the number of minutes of news listed in the program guides per day (or week), clock the precise number of minutes actually devoted to *news*. Break that down into weather (some stations spend more than 20% of a 30 minute "news" show on the charming personality of their weather person), sports, "entertainment" and hard news. Check the content of your television news show against the content of your local paper—do the stations just cover three of the biggest headline stories and forget the rest? Are there some controversial subjects that never seem to make the news? Some segments of your community that are overlooked? Are most of the events press conferences, most of the persons interviewed politicians or other "establishment" figures rather than ordinary citizens? How much of the "local" news show is actually *local* news and how much is some announcer reading wire service clips of national or regional stories? How much effort does the station expend covering the news? Is it strictly limited to the "rip-and-read" style of reportage, with an occasional still photo flashed on the screen, or does it actually employ camera crews and in-field announcers to cover personally those items of greatest local interest? If your city has a population that is, say, 20% black, what percentage of the news is devoted to covering the activities of the black community? How much time is wasted on news shows by jokes and entertainment from the "gang" (as on many segments of ABC's "Eyewitness News" format)—remember, in your average 30 minute news show you may only be getting 15 minutes or less of actual *reporting* to begin with.

Examine children's programming for a wide variety of factors, including commercialization, amount of cheap animation versus role-stimulating live entertainment, amount of "children's" programming that consists of little more than ancient series reruns or movies, or racial or sexual stereotypes on children's television. What is presented for children between 3:00 PM and 6:00 PM each day? Is age differentiated programming available for those under 6, 6 to 12, teenagers, and so forth, or is it just all "children's" programming?

Violence scales similar to the one recommended recently by the National Institute of Mental Health[28] might be employed to measure the amount of violence in television programming for a particular station. Is there more violence in television programming for a particular station? Is there more violence in children's programming? Is it commonly presented as an effective means of achieving desirable ends? Are the goals and values reflected in television programming really acceptable at all?[29]

Monitor for violations of the Fairness Doctrine.[30] To meet his obligations, the broadcaster has to fulfill two basic requirements. First, controversial issues, or issues of public importance, must be discussed. Second, balanced coverage of different viewpoints on these issues must be presented. The broadcaster has to bear the expense of meeting the fairness obligation if no paid advertising or programming is available, and he also must seek out spokesmen representing the other side of an issue. You may want to determine whether or not, and in what manner, broadcasters are meeting these requirements. A third aspect of Fairness Doctrine monitoring would be determining the percentage of controversial issues presented that are locally relevant. For example, inflation and the war in Southeast Asia may well have local angles and impact, but they are not, strictly speaking, "local" issues. The arguments on either side of whether to build a new freeway through the heart of town might be.

The wealth of information available from careful monitoring is, as you can see from this partial listing, enormous. If you can possibly muster the resources from within your organization, it is an option well worth the time and effort.

Examples of the United Church of Christ "Observer's Report Form" are given in the next four pages.

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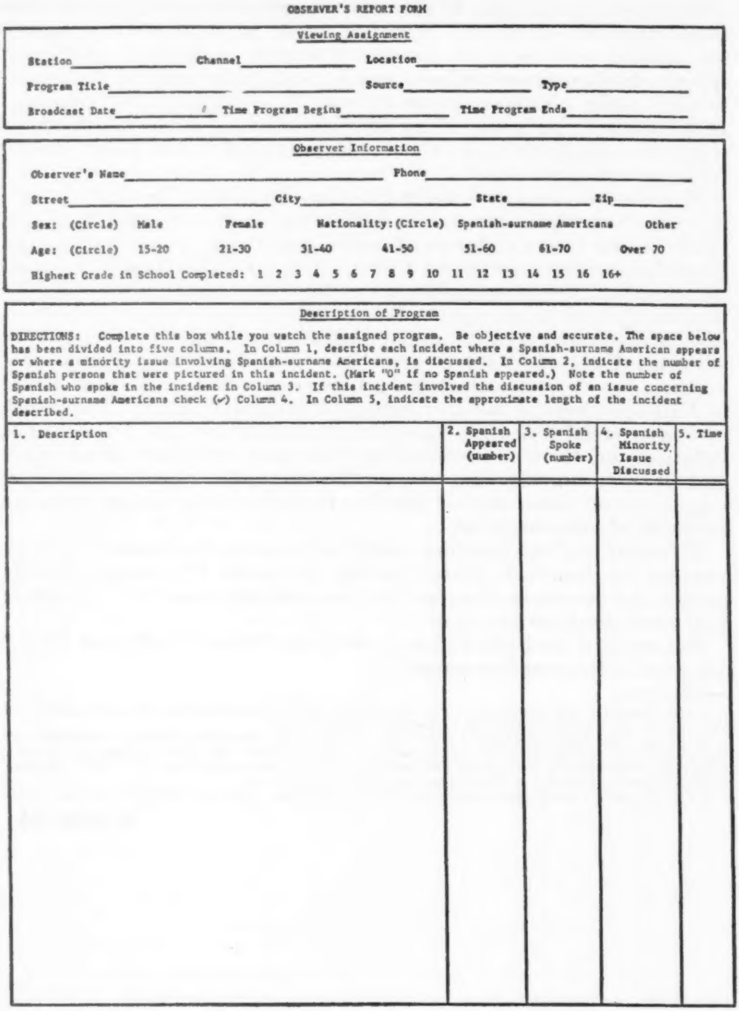
[28] *See* Comstock and Rubinstein, *ed.*, *Television and Social Behavior: Media Content and Control*, 29–34, National Institute of Mental Health (1971).

[29] *See, e.g.*, the *Staff Reports of the Surgeon General's Scientific Advisory Committee on Television and Social Behavior*, published by the National Institute of Mental Health, Department of Health, Education and Welfare (1971). *See especially* the volume entitled *Television and Growing Up: The Impact of Televised Violence.*

[30] *See Fairness Primer, supra* note 10. See also Prowitt, *Guide to Citizen's Action*, at 10.



OBSERVER'S REPORT FORM

**Viewing Assignment**

Station____________ Channel____________ Location______________________________

Program Title____________ ____________ Source____________ Type____________

Broadcast Date____________ Time Program Begins____________ Time Program Ends____________

**Observer Information**

Observer's Name______________________________ Phone______________________________

Street____________________ City____________________ State__________ Zip__________

Sex: (Circle) Male Female Nationality:(Circle) Spanish-surname Americans Other

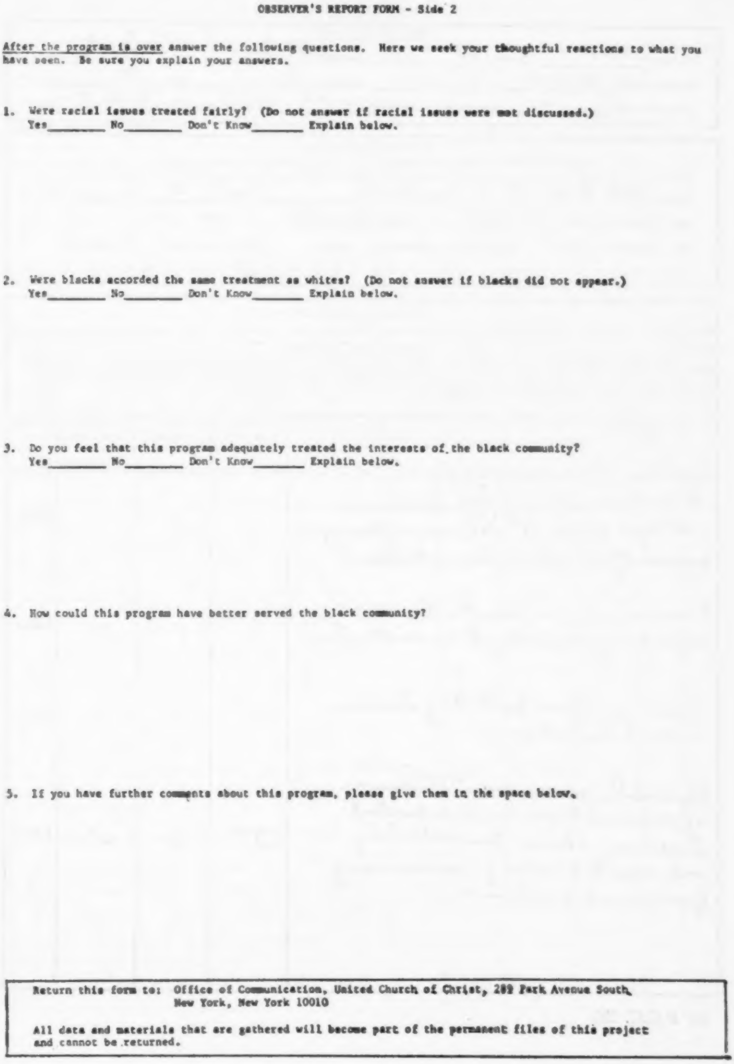
Age: (Circle) 15-20 21-30 31-40 41-50 51-60 61-70 Over 70

Highest Grade in School Completed: 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 16+

**Description of Program**

DIRECTIONS: Complete this box while you watch the assigned program. Be objective and accurate. The space below has been divided into five columns. In Column 1, describe each incident where a Spanish-surname American appears or where a minority issue involving Spanish-surname Americans, is discussed. In Column 2, indicate the number of Spanish persons that were pictured in this incident. (Mark "0" if no Spanish appeared.) Note the number of Spanish who spoke in the incident in Column 3. If this incident involved the discussion of an issue concerning Spanish-surname Americans check (✓) Column 4. In Column 5, indicate the approximate length of the incident described.

| 1. Description | 2. Spanish Appeared (number) | 3. Spanish Spoke (number) | 4. Spanish Minority Issue Discussed | 5. Time |
|---|---|---|---|---|
| | | | | |



OBSERVER'S REPORT FORM - Side 2

After the program is over answer the following questions. Here we seek your thoughtful reactions to what you have seen. Be sure you explain your answers.

1. Were racial issues treated fairly? (Do not answer if racial issues were not discussed.)
Yes________ No________ Don't Know_______ Explain below.

2. Were blacks accorded the same treatment as whites? (Do not answer if blacks did not appear.)
Yes________ No________ Don't Know_______ Explain below.

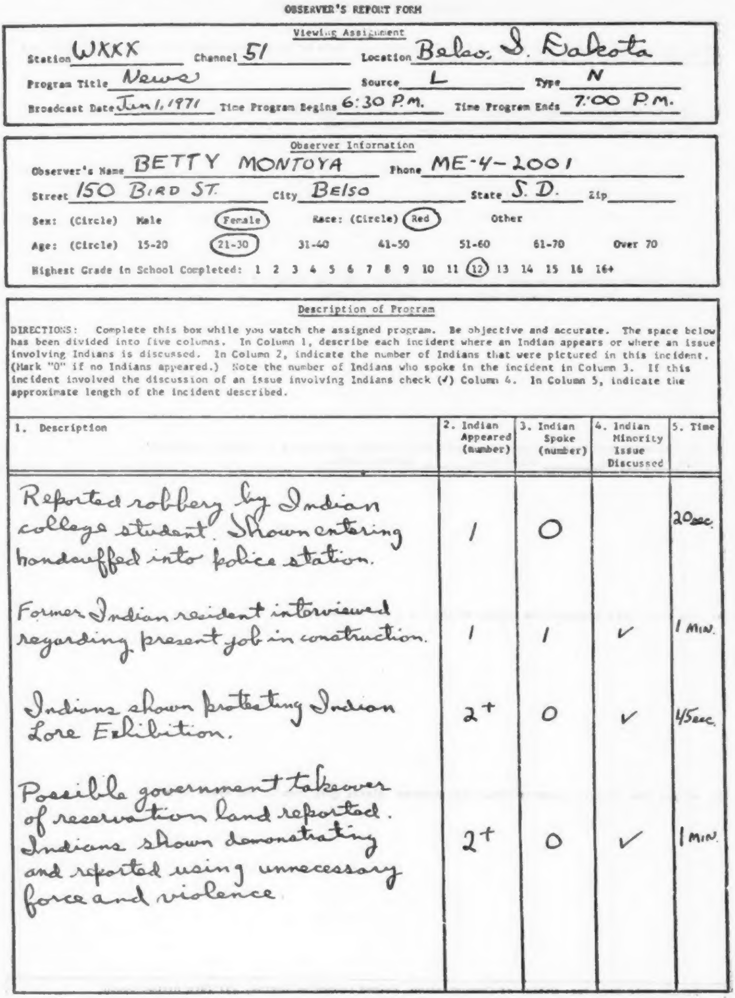
3. Do you feel that this program adequately treated the interests of the black community?
Yes________ No________ Don't Know_______ Explain below.

4. How could this program have better served the black community?

5. If you have further comments about this program, please give them in the space below.

Return this form to: Office of Communication, United Church of Christ, 289 Park Avenue South,
New York, New York 10010

All data and materials that are gathered will become part of the permanent files of this project and cannot be returned.



OBSERVER'S REPORT FORM

Viewing Assignment

Station WXKX Channel 51 Location Belso. S. Dakota

Program Title News Source L Type N

Broadcast Date Jun 1, 1971 Time Program Begins 6:30 P.M. Time Program Ends 7:00 P.M.

Observer Information

Observer's Name BETTY MONTOYA Phone ME-4-2001

Street 150 BIRD ST. City BELSO State S. D. Zip

Sex: (Circle) Male [✓ Female] Race: (Circle) [✓ Red] Other

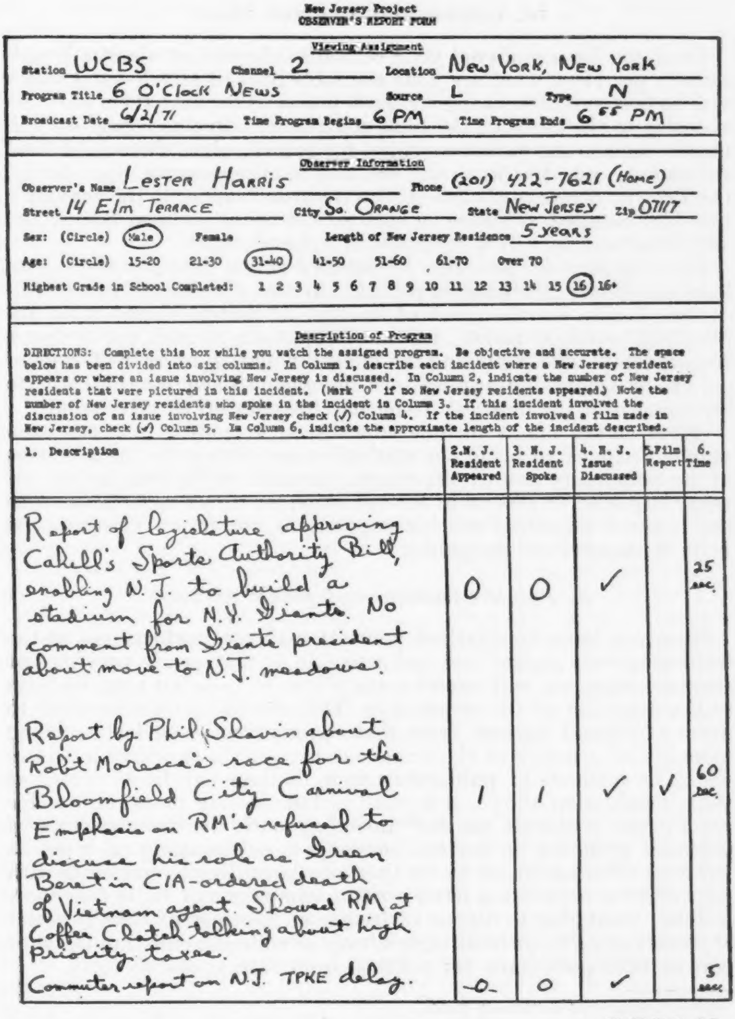
Age: (Circle) 15-20 [✓ 21-30] 31-40 41-50 51-60 61-70 Over 70

Highest Grade in School Completed: 1 2 3 4 5 6 7 8 9 10 11 [✓ 12] 13 14 15 16 16+

Description of Program

DIRECTIONS: Complete this box while you watch the assigned program. Be objective and accurate. The space below has been divided into five columns. In Column 1, describe each incident where an Indian appears or where an issue involving Indians is discussed. In Column 2, indicate the number of Indians that were pictured in this incident. (Mark "0" if no Indians appeared.) Note the number of Indians who spoke in the incident in Column 3. If this incident involved the discussion of an issue involving Indians check (✓) Column 4. In Column 5, indicate the approximate length of the incident described.

| 1. Description | 2. Indian Appeared (number) | 3. Indian Spoke (number) | 4. Indian Minority Issue Discussed | 5. Time |
|---|---|---|---|---|
| Reported robbery by Indian college student. Shown entering handcuffed into police station. | 1 | 0 | | 20 sec. |
| Former Indian resident interviewed regarding present job in construction. | 1 | 1 | ✓ | 1 MIN. |
| Indians shown protesting Indian Lore Exhibition. | 2+ | 0 | ✓ | 45 sec. |
| Possible government takeover of reservation land reported. Indians shown demonstrating and reported using unnecessary force and violence. | 2+ | 0 | ✓ | 1 MIN. |



New Jersey Project
OBSERVER'S REPORT FORM

Viewing Assignment

Station WCBS Channel 2 Location New York, New York
Program Title 6 O'Clock News Source L Type N
Broadcast Date 6/2/71 Time Program Begins 6 PM Time Program Ends $6^{55}$ PM

Observer Information

Observer's Name Lester Harris Phone (201) 422-7621 (Home)
Street 14 Elm Terrace City So. Orange State New Jersey Zip 07117
Sex: (Circle) [✓ Male] Female Length of New Jersey Residence 5 years
Age: (Circle) 15-20 21-30 [✓ 31-40] 41-50 51-60 61-70 Over 70
Highest Grade in School Completed: 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 [✓ 16] 16+

Description of Program

DIRECTIONS: Complete this box while you watch the assigned program. Be objective and accurate. The space below has been divided into six columns. In Column 1, describe each incident where a New Jersey resident appears or where an issue involving New Jersey is discussed. In Column 2, indicate the number of New Jersey residents that were pictured in this incident. (Mark "0" if no New Jersey residents appeared.) Note the number of New Jersey residents who spoke in the incident in Column 3. If this incident involved the discussion of an issue involving New Jersey check (✓) Column 4. If the incident involved a film made in New Jersey, check (✓) Column 5. In Column 6, indicate the approximate length of the incident described.

| 1. Description | 2. N. J. Resident Appeared | 3. N. J. Resident Spoke | 4. N. J. Issue Discussed | 5. Film Report | 6. Time |
|---|---|---|---|---|---|
| Report of legislature approving Cahill's Sports Authority Bill, enabling N.J. to build a stadium for N.Y. Giants. No comment from Giants president about move to N.J. meadows. | 0 | 0 | ✓ |  | 25 sec. |
| Report by Phil Slavin about Rob't Morasca's race for the Bloomfield City Carnival Emphasis on RM's refusal to discuss his role as Green Beret in CIA-ordered death of Vietnam agent. Showed RM at Coffee Clatch talking about high Priority taxes. | 1 | 1 | ✓ | ✓ | 60 sec. |
| Commuter report on N.J. TPKE delay. | -0- | 0 | ✓ |  | 5 sec. |

## III. WHAT ACTION CAN YON TAKE?

Once you have gathered your relevant information about a broadcaster's practices, what are your available lines of attack—and which will be best suited to changing those practices to make them more responsive to the needs of the local community? In this report we will merely outline the various avenues for reform, since there is no need for us to go into the detail you can find in other sources. Specifically, the Prowitt *Guide to Citizen Action* discussed earlier in the chapter[31] provides detailed guidance in each of the areas outlined below, and additional sources will be suggested in Appendix B.[32]

One category of potential community action involves the use of legal machinery: the filing of petitions to deny the renewal of a broadcaster's license (or the grant of transfer of control or any other application he might make), informal objections to such applications, formal complaints regarding the alleged violation of an FCC rule or policy, or competing applications designed to acquire the right to broadcast over the licensee's frequency for yourself or your group.

Other action might include educational or public relations campaigns designed to bring the station's shortcomings to the attention of the community as a whole, complaints made to the licensee himself regarding specific aspects of his operation, or direct negotiation with the licensee regarding specific suggestions for improvement or reform in his service to the public.

### *A. Public education and public relations*

Once you have familiarized yourself with the performance of the stations in your market area and zeroed in on the specific problems or shortcomings, you will almost certainly want to bring your findings to the attention of the community. This should be done in order to draw additional support from that community, as well as to bring some initial pressure on the licensee to correct the shortcomings himself. The methods of publicizing your findings can be as varied as your imagination allows, and could include issuing press releases for use by non-broadcast media,[33] including such disparate sources of potential publicity as student newspapers or shopping ad weeklies (or even other broadcast media that may be willing to cooperate with your effort); organizing letter-writing campaigns or radio talk show call-ins; arranging to discuss or lecture at meetings of church, social or community groups or at high schools or colleges; enlisting the support of local politicians (or political candidates); and so forth.

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[31] Hereinafter cited as *Citizen's Guide.*

[32] Lawyers should *see especially* two Office of Communications, United Church of Christ Publications: Jennings, *Guide to Understanding Broadcast Licensee Applications and Other FCC Forms,* and the forthcoming Bennett, *Representing the Audience in Broadcasting Proceedings.*

[33] You will run into problems, of course, in communities where the broadcast and non-broadcast media are wholly or partially controlled by the same entities. That is the situation, unfortunately, in far too many of the cities in our study. See the discussion of this problem in Chapter 2 of this Report.

### *B. Informal complaints*

Complaints can sometimes achieve results if made in sufficient quantity (or with sufficient legal specificity). Their major drawback, of course, is that they depend on the goodwill of the broadcaster for their success. You will therefore achieve the best results if you are careful to avoid overly-general complaints and limit yourself to alleging the violation of specific Commission rules or policies, such as the fairness doctrine, equal employment rules, equal time provisions, and so forth. Such informal complaints should, as suggested by Ms. Prowitt in the *Citizen Guide*, 1) state the facts clearly as you see them, including your name, the station's call letters, and the specific actions complained of; 2) cite a standard to which you can relate your grievance or proposal; and 3) request a *specific* remedy, such as a new kind of program, an increase in minority employment or the opportunity to present the other side of a controversial issue or respond to a personal attack.[34]

In addition to complaining directly to the station you may want to broaden the scope of your action by complaining at the same time to its biggest local or national advertisers, the network with which the station is affiliated (if any), the local chamber of commerce—in short, anyone you feel might be in a position to care about or perhaps attempt to influence the licensee's activities. In some cases, the subject matter of the complaint may dictate additional parties who should receive it: if the complaint concerns the absence of local public service announcements, for example, complaints might be delivered to local hospitals or boys clubs or service organizations which would benefit from improved performance as well as to the station. As a final step, of course, you should bear in mind that complaints can also be made to the FCC—or, indeed, to other government agencies, such as the FTC or the EEOC, at state and city levels as well as federal. These will be mentioned again under "legal action" below.

### *C. Negotiation*

Direct negotiation between your group and the broadcaster can conceivably bring about the greatest degree of change possible with limited organizational resources. Once you have set *specific* goals for improvement of the service of broadcasters in your community, and have acquired relatively wide support for those goals, much may be accomplished in face-to-face negotiation with the broadcaster *provided:* 1) your goals have as their basis one or more of the specific obligations implicitly or explicitly required of the broadcaster by statute or Commission rules or policies, and 2) you can demonstrate to the broadcaster your determination to pursue your goals through more formal legal remedies if negotiations are not successful. For further information regarding this tactic, we would refer you once again to the *Citizen Guide*, which includes as an appendix a copy of just such an agreement negotiated between community groups and broadcasters in Texarkana, Texas.[35]

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[34] *Citizen's Guide*, at 19.

### *D. Formal legal complaints*

If informal actions fail to induce the necessary changes in broadcast service to your community, you will probably want to pursue the various legal remedies available to you. We can do little more than enumerate these remedies within the scope of this report; but again, there are a number of sources for lawyers and laymen that set out pretty clearly the procedures you can pursue.[36] You have four basic avenues of FCC legal attack available to you. In order of increasing difficulty, they are: complaints to the Commission; informal objections to a licensee application; formal petitions to deny an application, either for renewal of a license or some other operating modification; or a competing application for the frequency on which the current licensee is operating.

Complaints to the Commission are perhaps the least effective form of legal action, but they have the virtue of being simple to generate. Moreover, if a complaint is carefully drawn, so that it raises a significant *legal* issue concerning the licensee's violation of some Commission statute, rule or policy, it can require at the very least that the Broadcast Bureau act to determine whether or not it has merit, thereby creating a ruling capable of being appealed to the full Commission and, ultimately, to the United States Court of Appeals.[37] Don't allege generalizations in complaints to the Commission, such as "this station discriminates against blacks and Spanish-surnamed citizens." Go into sufficient detail, based on your observations or research, to allege specific instances of violation and to request specific remedies. *Force the Commission to accept or deny* the premise of your complaint—not merely dismiss it as "overly vague," or thank you for providing information which merely will be "associated" with a station file—because by doing so you will almost certainly be forcing the station to defend its policies. The more specific your complaint and your request for a remedy, in other words, the more likely is the station to feel the pressure of your desire for change.

### *E. Informal objections*

Informal objections are generally associated with the application of a licensee for renewal of its license.[38] Unlike a petition to deny, however, this type of legal action may be taken at any time up to the actual grant of a licensee's application, and must be considered by the Commission in its process of weighing the evidence for against the licensee. The element of time is therefore not so important with an informal objection as with a petition to deny, and that is perhaps its chief virtue; however, it stands to reason that an informal objection, in order to be taken seriously, must involve allegations of considerably greater importance than those which are acceptable in a normal petition to deny. It is well to reserve this legal tool for serious allegations, such as fraud or some other such gross malfeasance, discovered when it is too late to file an actual petition to deny. And while the procedural rules regarding the content of an informal objection are less stringent than those concerned with more formal petitions, you would do well to treat this type of application every bit as seriously as you would any other (particularly if it is the only option open to you because you have not been able to complete your research before the cut-off date for petitions to deny has been passed).

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[35] *Id.*, Appendix D, at 39.

[36] *See* sources cited in notes 18 and 32 *supra* and Appendix B of this Report.

[37] Appeal to the courts need not be prosecuted in the D.C. Circuit Court alone, although most end up in that circuit. You should bear in mind that the Circuit Court of Appeals sitting in your part of the country, although it might not necessarily possess the communications or regulatory "expertise" of the D.C. Circuit, could conceivably bring a fresher outlook on local problems to their decision.

[38] 47 C.F.R. § 1.587.

### *F. Petitions to deny*

Petitions to deny must be filed by a "party of interest" in the licensee's application proceeding, pursuant to rather stringent rules of procedure set out by the Commission in a number of sources to which we've alluded above.[39] As members of the community the broadcaster is supposed to serve, you should have no difficulty establishing yourself as a "party of interest,"[40] and you should be prepared at each stage of your research and negotiation process to put together a well-documented petition setting out carefully all the reasons you feel the licensee has failed to serve the public. The *Citizen Guide* spells out this requirement in greater detail:

> If, for example, one of your charges is that the station discriminates against minority people in its employment, you should support this allegation with *specific* information which might include statistics on the low employment of minority people in each category of station responsibility as compared with population of minority groups in the city or of minority people who have applied for employment; signed statements (affidavits) of minority persons who have been denied employment, citing specific violations of the equal employment rules and other relevant material.[41]

In other words, the more carefully organized you make your allegations, the greater the likelihood of a positive FCC response—and the greater the pressure on the licensee to compromise with your group on reform of his programming or other practices. Since, as the Citizen Guide points out, the petition to deny is a "severe action . . . costly and time consuming [to both parties]," you should only consider it as "the last resort when other means of achieving necessary change . . . have failed."[42] Nevertheless, you should from the beginning be prepared to demonstrate to the broadcaster that you have the patience, the resources *and the legal capacity* to carry through with a challenge to the renewal of his license.[43]

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[39] 47 C.F.R. § 1.580. *See* also the *Procedure Manual, supra* note 18.

[40] *See, e.g., Office of Communication of the United Church of Christ* v. *FCC*, 359 F2d 994 (1966), in which the Court of Appeals held that the Commission's "traditional position that members of the listening public do not suffer any injury peculiar to them and that allowing them standing would pose great administrative burdens" was erroneous and not in with the Commission's own pronouncement that "*individual citizens and the communities they compose owe a duty to themselves and their peers to take an active interest in the scope and quality of the television service* which . . . *has a vast impact on their lives and the lives of their children* . . ." [emphasis in the opinion], 359 F2d 994, 1000–1006.

[41] *Citizen's Guide*, at 27.

[42] *Id.*, at 26.

A petition to deny a licensee's application for renewal has one major temporal drawback: such an application need only be filed once every three years, and once a station's license has been renewed a community group may find itself with considerably less influence for the next two years or so. There are, however, other types of proceedings in which you may be able to participate, and you will do well to determine whether any of the licensees in your community are or will be involved in any of them. Any time a licensee makes a major alteration in his facilities, for example, he is required to file an application for such an alteration which may be challenged by a community group. If he seeks to move his principal studio, for example, or shift his antenna to a new location or increase his power he is required to apply just as if he were seeking a new facility.

Note carefully the business plans of the licensees in your community; are any intending to sell their stations in the near future, assigning or transferring their license to a *new* licensee? You will want to *insist* on becoming a party to that sort of transaction, especially if it involves a television station, so as to ensure a higher level of service by the new licensee. Examine his proposals, and bring to his attention the shortcomings of the previous licensee.

Finally, you will want to apprise yourself of the nature and extent of a licensee's holdings *other than* the station in your community. An overwhelming majority of the licensees in this study, for example, own two or more broadcast facilities,[44] and it will be the rare licensee whose licenses all expire in the same renewal period. You may well be able successfully to apply pressure on the substandard licensee in your community by working with groups in other cities in which it holds licenses. This type of activity requires little but increased coordination, and this as well as each of the other activities mentioned above are simply illustrative of the axiom that the more you know about *every* aspect of your licensees the more effective you can be in dealing with their shortcomings in your community.

### *G. Competing applications*

One last, drastic measure you may be inclined to pursue, particularly if you are saddled with a licensee who blatantly refuses to serve the public interest, is a competing application for use of the frequency itself. Such an application can be made, pursuant to Commission rules, whenever a broadcaster's license comes up for renewal. It should not be made frivolously, but only after careful deliberation and accumulation of sufficient operating capital and programming and technical expertise; if each of the latter is available, however, and your allegations of misfeasance are sufficiently serious, you may wish to compete for the frequency, which does, after all, belong to the *public* and not the existing licensee. Note carefully the rules and policies that must be followed by a competing applicant, however, and make certain you are both willing and able to meet the requirements of each step in the procedure.[45]

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[43] You should always attempt to include one or more lawyers in your group, and your legal counsel should always be prepared on the various filings that could be made against a station relatively quickly. His or her preparation should therefore begin as early as possible, and preferably before any contact with the station has been made. Many of the people cited in this chapter or listed in Appendix B stand ready to help you understand the legal vagaries of the potential challenges and complaints outlined here, in the *Citizen's Guide* and in the sources cited.

[44] See the extensive cross-ownership tables in Chapter 3 of this Report, but bear in mind even they are far from complete in terms of various individuals' or corporations' nonbroadcast interests.

## APPENDIX A

### SYSTEMS METHODOLOGY *

### I. INTRODUCTION

In this section, we hope to give the reader some insight into the computer programming methods implemented to produce the results of this project. It should be noted that because this was a pilot project and the goals that were to be accomplished were not clearly ascertained at the inception of the analysis stage, the computer programming algorithm hereinafter set forth is not the most efficient; however, it has proven to be viable.

Basically, the analysis was conducted in two parts. The first part concerned the analysis of the data relating to female and minority employment practices of the broadcast licensees. The information processed pursuant thereto was acquired from the FCC Form 395, which is an annual employment report filed by all broadcasting stations. The second stage of the analysis concerned the licensee's programming profile and included an analysis of the station's news, public affairs, local programming, commercialization, public service announcements and financial data. The source of this data was the FCC Form 303 which is filed by the broadcaster every three years in application for renewal of his license.

The computer language used in this analysis was Fortran IV compiled on an IBM 360 model 40. Other languages might have been used; however, Fortran or a similar type of language was necessary to perform the numerous computations on the raw data from the FCC forms. The language may become inefficient when many sorts and cross-tabulations have to be performed but a balance had to be found between the flexibility of the type of output and the efficiency of the computer program itself. The Fortran IV language, in contrast to cross-tabulation and sorting languages, is adaptable to any form of input and output data.

The programs themselves are simply too lengthy to be included in this report, but a copy may be obtained by writing to Larry Harbin, in care of Commissioner Nicholas Johnson, Federal Communications Commission, Washington, D.C. 20554 (mail will be forwarded).

### II. EMPLOYMENT ANALYSIS

The input data for the employment programs was comprised of the computer card for each licensee and 50 additional cards containing information pertaining to the top 50 market areas, such as the name of the city in which the licensee is located and the percentage of minorities in the SMSA. The format of the employment data cards is shown at the end of this appendix.

The first step performed by the computer program was the reading of 50 data cards containing information on the market numbers, the percentage of minorities in that particular SMSA, and the name of the city designated by that market number. Then, as each data card pertaining to the employment profile of the individual licensee was read, a first array was formed that contained the elements of the output data. Those elements were the station identifiers [call letters, market number, etc.], percentage of minorities in the market area, the number of job positions in the top five job categories, the number of minorities in the top five job categories, the percentage of minorities in the top five job categories, the total number of employees, the total number of minorities employed, and a ranking factor. A second array was formed with the same station identifiers along with the number of top five positions, number of females employed in those positions, and the percentage of females in those positions.

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[45] *See, e.g.*, the *FCC Policy Statement on Comparative Hearings*, 1 FCC 2d 393 (1965).

*High-speed computations for this project were carried out at the Georgetown University Academic Computation Center.

Once all the data cards were read into the computer and all the manipulations and computations were performed to create the arrays, a simple sort routine operated on the arrays to order the first array [minority employment] according to the magnitude of the ranking factor, e.g. from highest to lowest. A numerical integer was assigned to each station from one to the number of stations analyzed [200 maximum]. A similar ordering was performed on the same array according to the magnitude of the percentage of minorities employed.

With regard to the second array [female employment], a single ordering was performed according to the percentage of females employed in the top five job categories.

The results of this employment program produced three different rankings containing the information as previously described. Those three ranks include two ranks re minority employment, one by ranking factor and the other by percentage of minorities employed; and one ranking re female employment by percentage of females employed in the top five job positions.

*Input Format For Employment Data—Source: FCC Form 395*

| Label | Card columns | Data type |
|---|---|---|
| Call Letters | 1-4 | Alpha |
| Market Number | 5-6 | Integer |
| Network Affiliation | 7-9 | Alpha |
| Total Official & Managers | 10-12 | Integer |
| Total Professionals | 13-15 | Integer |
| Total Technicians | 16-18 | Integer |
| Total Sales | 19-21 | Integer |
| Total Craftmen | 22-24 | Integer |
| Total Employees | 25-27 | Integer |
| Female Official & Managers | 28-29 | Integer |
| Female Professionals | 30-31 | Integer |
| Female Technicians | 32-33 | Integer |
| Female Sales | 34-35 | Integer |
| Female Craftmen | 36-37 | Integer |
| Female Total | 38-39 | Integer |
| Black Males Official & Managers | 40-41 | Integer |
| Black Males Professionals | 42-43 | Integer |
| Black Males Technicians | 44-45 | Integer |
| Black Males Sales | 46-47 | Integer |
| Black Males Craftmen | 48-49 | Integer |
| Black Males Total | 50-51 | Integer |
| Other Male Minorities: | | |
| Top 2 | 52-53 | Integer |
| Top 5 | 54-55 | Integer |
| Total | 56-57 | Integer |
| Black Females Official & Managers | 58-59 | Integer |
| Black Females Professionals | 60-61 | Integer |
| Black Females Technicians | 62-63 | Integer |
| Black Females Sales | 64-65 | Integer |
| Black Females Craftmen | 66-67 | Integer |
| Black Females Total | 68-69 | Integer |
| Other Female Minorities: | | |
| Top 2 | 70-71 | Integer |
| Top 5 | 72-73 | Integer |
| Total | 74-75 | Integer |

## III. PROGRAMMING ANALYSIS

The analysis of the programming of the licensees is somewhat more complicated than that of the employment analysis. The input data comprised three sets of data cards. The first set of input cards included one data card for each station, containing information relating to public service announcements, news, public affairs, etc. The format and exact contents of such data cards are described at the end of this text. The second set of cards is the same as that for the employment program containing information relevant to each of the top fifty market areas. The third set of cards contained confidential financial information for each licensee, coded so as to reveal relative information about a licensee's performance, but not specific figures.

Similar to the employment program, the first step performed was the reading of the fifty data cards; containing information about the market areas; into a market array. The second operation was the reading of the financial information for the licensees into what will be called a financial array.

As each programming data card was read, means were provided for retrieving market area information from the market array and financial information from the financial array. Computations were performed to convert figures of hours and minutes into a decimal representation of hours in order to facilitate other computer functions. A maximum of 200 broadcast stations may be analyzed with this program.

The first output from this program is a ranking of the licensees according to a local programming indicia computed by the sum of the prime time local programming and total local programming divided by two.

The second ranking is simply an ordering of the licensees according to the sum of the quantities of news, public affairs, and "other" programming, as depicted on the FCC Form 303.

The third ranking is an ordering of the licensees according to the number of public service announcements, and the fourth ranking is an ordering according to the number of hours in the composite week having more than 12 minutes of commercials. The latter ranking is ordered from lowest to the highest.

The financial ranking is an ordering of the licensees according to the magnitude of the ratio of programming expenses over broadcast revenues.

The composite ranking is a conglomeration of four different ranking criteria. They include (1) local programming, (2) news, public affairs and "other," (3) commercialization, and (4) financial evaluations. In order that each element have an equal weight or have equal effect on the composite ranking, the licensees were assigned a number between zero and 100 for each of the four evaluation criteria, and the composite ranking is then based on an average of those four numbers.

With regard to local programming, the number one licensee sets the scale, i.e. the indicia of 20.92 represents 100/100. An indicia of zero is represented by zero, however, the lowest indicia 1.71 is 8.17/100, representing the worst station in the top fifty markets with regard to local programming.

A similar analysis is made with the news, public affairs, and "other." 45.83 hours represents 100 and 12.40 hours represents 27.05/100, zero being the lowest.

Re the commercialization ranking, the worst licensee sets the scale on the low end. The licensee with the highest number of 60 minute segments having 12 or more minutes of commercials is assigned a value of zero on the scale between zero and 100. A licensee with zero segments having 12 or more minutes of commercials is assigned a value of 100; however, the best licensee in this report is rated 96.61/100, with two segments having 12 or more minutes of commercials.

Concerning the financial factor, the licensee having the highest program expense/revenue ratio is assigned 100. A ratio of zero is assigned zero on the scale.

Once all of these factors have been computed, a final composite figure, by which the composite rank is ordered, is defined by an average of the four factors. Thus, the optimum performance of a licensee, according to the four pre-defined criteria, is 100. The best licensee is rated at 63.5, which is well below its peak performance of 100, assuming that any station can perform 100 in each of the four evaluation criteria.

*Input Format For Programming Data—Source: FCC Form 303*

| Label | Card column | Data type |
|---|---|---|
| Call Letters | 1-4 | Alpha |
| Market Number | 5-6 | Integer |
| Network Affiliate | 7-9 | Alpha |
| Composite Week: | | |
| Hours | 10-12 | Integer |
| Minutes | 13-14 | Integer |
| News: | | |
| Hours | 15-16 | Integer |
| Minutes | 17-18 | Integer |
| Public Affairs: | | |
| Hours | 19-20 | Integer |
| Minutes | 21-22 | Integer |
| "Other": | | |
| Hours | 23-24 | Integer |
| Minutes | 25-26 | Integer |
| Local Programming: | | |
| Hours | 27-28 | Integer |
| Minutes | 29-30 | Integer |
| Prime Time Local Programming: | | |
| Hours | 31-32 | Integer |
| Minutes | 33-34 | Integer |
| Public Service Announcements: | | |
| Hours | 35-36 | Integer |
| Minutes | 37-38 | Integer |
| Commercialization: | | |
| 12-16 | 68-69 | Integer |
| 16+ | 70-71 | Integer |

*Input Format For Financial Data*

| Label | Card column | Data type |
|---|---|---|
| Call Letter | 1-4 | Alpha A4 |
| Ratio: Program Expense/Gross Revenue | 5-9 | Real F5.1 |

*Input Format—Market Area Data Cards*

| Label | Card columns | Data type |
|---|---|---|
| Call Letters | 1-4 | Alpha A4 |
| Number | 5-6 | Integer 12 |
| True Market Number | 7-8 | Integer 12 |
| SMSA | 9-12 | Real F4.1 |
| Location | 13-32 | Alpha 5A4 |

## APPENDIX B

Listed below are selected citizens organizations and resource materials that might be useful to you.

### CITIZENS ORGANIZATIONS

Mr. Thomas Asher
Media Acces Project
1910 N Street, N.W.
Washington, D.C. 20036
Mr. Charles Baker
Institute of American Democracy, Inc.
1330 Massachusetts Avenue, N.W.
Washington, D.C. 20005

Professor John Banzhaf
George Washington University
National Law Center
720 20th Street, N.W.
Washington, D.C. 20006
Mr. Bill W. Wright
Black Efforts for Soul in Television
1015 North Carolina Avenue, S.E.
Washington, D.C. 20003

### CITIZENS ORGANIZATIONS—Continued

Mr. Robert Choate
1346 Connecticut Avenue, N.W.
Room 535
Washington, D.C. 20036
Mr. Allen Ferguson
Public Interest Economics Center
1714 Massachusetts Avenue, N.W.
Washington, D.C. 20036
Mr. Ted Jacobs
Center for the Study of Responsive Law
1908 Q Street, N.W.
Washington, D.C. 20009
Mr. Frank Lloyd
Executive Director
Citizens Communications Center
1812 N Street, N.W.
Washington, D.C. 20036
Mr. Joseph Onek
Center for Law and Social Policy
1751 N Street, N.W.
Washington, D.C. 20036
Mr. Richard L. Ottinger
Hydeman and Mason
1225 19th Street, N.W.
Washington, D.C. 20036
Mr. Tracy A. Westen
Stern Community Law Firm
2005 L Street, N.W.
Washington, D.C. 20036
Mr. Ralph Nader
Public Citizen, Inc.
1346 Connecticut Avenue
Washington, D.C. 20036
Mr. Mark Green
Project on Corporate Responsibility
1609 Connecticut Avenue, N.W.
Washington, D.C. 20009
Action for Children's Television
33 Hancock Avenue
Newton Centre, Massachusetts 02159
American Council for Better Broadcasts
17 West Main
Madison, Wisconsin 53703
Communications Policy Committee
American Civil Liberties Union
156 Fifth Avenue
New York, New York 10010
Corporation for Public Broadcasting
888–16th Street, N.W.
Washington, D.C. 20006
Institute for Policy Studies
1520 New Hampshire Avenue, N.W.
Washington, D.C. 20036
National Association for Better Broadcasting
373 Northwestern Avenue
Los Angeles, California 90004
National Citizens Committee for Broadcasting
609 Fifth Avenue
New York, New York 10017
Rev. Everett Parker
Director (also Jane Goodman and Ralph Jennings)
Office of Communication
United Church of Christ
289 Park Avenue South
New York, New York 10010
Television, Radio & Film Commission
The Methodist Church
476 Riverside Drive
New York, New York 10027
The Network Project
Earl Hall
Columbia University
New York, New York 10027

### THE NETWORKS

American Broadcasting Cos., Inc.
1330 Avenue of the Americas
New York, New York 10019
Columbia Broadcasting System, Inc.
51 West 52nd Street
New York, New York 10019
National Broadcasting Co.
30 Rockefeller Plaza
New York, New York 10020
Mutual Broadcasting Co.
135 West 50th Street
New York, New York 10019

### INDUSTRY ASSOCIATIONS

National Association of Broadcasters
1661 N Street, N.W.
Washington, D.C. 20036
Television Information Office
745 Fifth Avenue
New York, New York 10022

### FEDERAL GOVERNMENT

Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

### RESOURCE MATERIAL

1. *A Public Citizen's Action Manual,* by Donald K. Ross; Grossman Publishers, New York, 1973.
2. *Corporate Power in America,* ed. by Ralph Nader and Mark J. Green; Grossman Publishers, New York, 1973.
3. *The Monopoly Makers,* ed. by Mark J. Green; Grossman Publishers, New York, 1973.
4. *Action for a Change: A Student's Guide to Public Interest Organizing,* by Ralph Nader and Donald Ross; Grossman Publishers, New York, 1971.
5. *The Closed Enterprise System,* by Mark J. Green with Beverly C. Moore, Jr., Bruce Wassustein; Bantam, 1973.
6. *Television and the Public,* by Robert T. Bower; Holt, Rinehart and Winston, Inc., New York, 1973.
7. *Representing the Audience in Broadcast Proceedings,* by Robert W. Bennett; United Church of Christ, Office of Communication, New York, 1973.
8. *Guide to Understanding Broadcast License Applications and Other FCC Forms,* by Ralph M. Jennings; Office of Communication, United Church of Christ.
9. *Federal Communications Commission Procedural Manual* (from F.C.C.).
10. *Policy Statement on Comparative Broadcast Hearings,* 1 F.C.C. 2d 393 (1965).
11. *Policy Statement Concerning Comparative Hearings Involving Regular Renewal Applicants,* 22 F.C.C. 2d 424 (1970).
12. *In Re Formulation of Policies Relating to the Broadcast Renewal Applicant, Stemming From the Comparative Hearing Process, Further Notice of Inquiry,* 31 F.C.C. 2d 443 (1971).
13. *Applicability of the Fairness Doctrine,* Office of Information, Federal Communications Commission.
14. *Guide to Citizen Action in Radio and Television,* United Church of Christ, Office of Communication, New York.
15. *Use of Broadcast Facilities by Candidates for Public Office,* F.C.C., Office of Information.
16. *In the Matter of a Personal Attack,* (FCC 67–795) Office of Information, F.C.C.
17. *A Short Course in Cable,* Office of Communication, United Church of Christ, New York.
18. *Cable Television, a Guide to Citizen Action,* by Monroe Price and John Wickleiu; Office of Communication, United Church of Christ, 1971.
19. *How to Protect Citizens Rights in Television and Radio,* Office of Communication, United Church of Christ, 1969.
20. *Guide to Citizen Action in Radio and Television,* by Marsha O'Bannon Prowitt; Office of Communication, United Church of Christ, New York, 1971.
21. *Racial Justice in Broadcasting,* Office of Communication, United Church of Christ.
22. *How to Talk Back to Your Television Set,* Nicholas Johnson; Bantam, 1970.

## APPENDIX C

### ADDITIONAL TABLES OF INFORMATION

These additional Tables deal largely with the same statistics analyzed in the text of the study. Except for Tables 1–a and 8–a, they present the information of Chapters 1 and 2 *by market* rather than in order of their rank, in order to enable the reader to compare the performances of the three affiliates in each of the 50 cities.

Table 1–a is the same composite ranking found in Tables 1 and 2, but with the relative performances of each station more precisely detailed by the analytical tool of relating the hours-and-minutes (etc.) performance levels to a 0 to 100 scale, as detailed in Appendix A.

Table 8–a ranks the affiliates solely on the basis of their total percentage of minority employment (*without* adding in the factor of the number of minorities in the SMSA).

The Tables in this Appendix are as follows (with reference to the corresponding tables in the main text in parentheses):

*Table 1–a* (Tables 1 and 2)
    Composite Rank of all Programming Criteria (on a 0–100 scale)
*Table 2–a* (Tables 1 and 2)
    Composite Rank of all Programming Criteria (by market)
*Table 3–a* (Table 3)
    Hours and Rank of News, Public Affairs and Other (by market)
*Table 4–a* (Table 4)
    Public Service Announcements (by market)
*Table 5–a* (Table 5)
    Commercialization (by market)
*Table 6–a* (Table 6)
    Hours and Minutes of Local Programming (by market)
*Table 7–a* (Table 7)
    Ranking Based on Ratio of Program Expenses to Gross Revenues (by market)
*Table 8–a* (Table 8)
    Network Affiliates Ranked by Percent Minorities Employed
*Table 9–a* (Tables 8 and 8–a)
    Network Affiliates Ranked by Percent Minorities Employed (by market)
*Table 10–a* (Table 8)
    Percent Minorities Employed/Percent Minorities in SMSA (by market)
*Table 11–a* (Table 9)
    Percent Minorities Employed in High Pay Positions (by market)
*Table 12–a* (Table 10)
    Percent Women Employed in High Pay Positions (by market)

### *Network Affiliates Ranked by Composite of All Programming Criteria*

| Rank | Call letters | Net. aff. | Mkt. No. | Location | Local | News, PA and other | Commer. | Financial | Composite |
|---|---|---|---|---|---|---|---|---|---|
| 1 | KPIX | CBS | 8 | San Francisco | 54.98 | 84.44 | 96.61 | 56.30 | 73.08 |
| 2 | WJZ | ABC | 19 | Baltimore | 66.89 | 66.18 | 77.97 | 77.18 | 72.06 |
| 3 | KING | NBC | 16 | Seattle-Tacoma | 41.83 | 68.15 | 69.49 | 98.74 | 69.55 |
| 4 | KDKA | CBS | 9 | Pittsburgh | 68.61 | 89.09 | 50.85 | 67.40 | 68.99 |
| 5 | KYW | NBC | 4 | Philadelphia | 75.10 | 89.05 | 55.93 | 51.01 | 67.77 |
| 6 | WPLG | ABC | 18 | Miami | 63.47 | 100.00 | 33.90 | 68.14 | 66.38 |
| 7 | WMAL | ABC | 10 | Washington, D.C | 56.33 | 70.58 | 45.76 | 91.27 | 65.99 |
| 8 | WTAE | ABC | 9 | Pittsburgh | 48.29 | 65.89 | 66.10 | 82.12 | 65.60 |
| 9 | WFMY | CBS | 48 | Gnsb-High Pt-Win Sal | 34.46 | 70.91 | 93.22 | 63.18 | 65.44 |
| 10 | KGW | NBC | 26 | Portland | 44.02 | 72.58 | 44.07 | 99.77 | 65.11 |
| 11 | WWL | CBS | 31 | New Orleans | 65.74 | 76.29 | 37.29 | 75.25 | 63.64 |
| 12 | WRC | NBC | 10 | Washington, D.C | 50.00 | 82.87 | 28.81 | 92.28 | 63.49 |
| 13 | WABC | ABC | 1 | New York City | 45.42 | 61.89 | 44.07 | 100.00 | 62.84 |
| 14 | KNBC | NBC | 2 | Los Angeles | 71.51 | 93.42 | 11.86 | 74.41 | 62.80 |
| 15 | WIIC | NBC | 9 | Pittsburgh | 60.56 | 67.16 | 28.81 | 91.73 | 62.07 |
| 16 | WTIC | CBS | 22 | Hartford-New Haven | 43.74 | 74.98 | 74.58 | 53.93 | 61.81 |
| 17 | WNAC | ABC | 6 | Boston | 53.98 | 69.78 | 54.24 | 66.73 | 61.18 |
| 18 | KATU | ABC | 26 | Portland | 50.00 | 55.67 | 54.24 | 84.53 | 61.11 |
| 19 | WHAS | CBS | 36 | Louisville | 54.78 | 60.18 | 49.15 | 79.39 | 60.88 |
| 20 | KCRA | NBC | 27 | Sacramento-Stockton | 56.57 | 83.75 | 37.29 | 64.48 | 60.52 |
| 21 | KOIN | CBS | 26 | Portland | 38.33 | 74.95 | 40.68 | 84.99 | 59.74 |
| 22 | WBNS | CBS | 28 | Columbus | 59.76 | 78.69 | 33.90 | 65.79 | 59.53 |
| 23 | KIAR | NBC | 45 | Phoenix | 64.34 | 64.98 | 38.98 | 69.27 | 59.39 |
| 24 | KOMO | ABC | 16 | Seattle-Tacoma | 54.94 | 64.36 | 40.68 | 76.39 | 59.09 |
| 25 | WLWT | NBC | 20 | Cincinnati | 100.00 | 48.73 | 16.95 | 69.75 | 58.86 |
| 26 | WCBS | CBS | 1 | New York City | 41.83 | 91.53 | 25.42 | 76.60 | 58.84 |
| 27 | KMOX | CBS | 12 | St. Louis | 47.21 | 85.45 | 28.81 | 73.74 | 58.80 |
| 28 | WSM | NBC | 30 | Nashville | 58.84 | 55.67 | 38.98 | 81.51 | 58.75 |
| 29 | WKY | NBC | 41 | Oklahoma City | 61.00 | 61.89 | 47.46 | 64.27 | 58.65 |
| 30 | WAST | ABC | 37 | Albany-Schenectady-T | 21.08 | 48.55 | 67.80 | 95.74 | 58.29 |
| 31 | WSB | NBC | 17 | Atlanta | 67.93 | 67.02 | 44.07 | 53.23 | 58.06 |
| 32 | WBZ | NBC | 6 | Boston | 61.79 | 81.78 | 44.07 | 44.58 | 58.06 |
| 33 | KSL | CBS | 50 | Salt Lake City | 47.85 | 59.45 | 32.20 | 92.30 | 57.95 |
| 34 | WMAR | CBS | 19 | Baltimore | 63.23 | 76.18 | 35.59 | 55.81 | 57.70 |
| 35 | WZZM | ABC | 41 | Kalamazoo-Gr Rapids | 30.48 | 69.09 | 45.76 | 84.36 | 57.42 |
| 36 | WDSU | NBC | 31 | New Orleans | 59.96 | 67.09 | 33.90 | 67.84 | 57.20 |
| 37 | WRTV | NBC | 14 | Indianapolis | 45.22 | 70.73 | 47.46 | 65.05 | 57.11 |
| 38 | WBEN | CBS | 25 | Buffalo | 48.01 | 77.24 | 40.68 | 62.15 | 57.02 |
| 39 | WNRC | NBC | 1 | New York City | 47.01 | 81.38 | 32.20 | 66.96 | 56.89 |
| 40 | KNXT | CBS | 2 | Los Angeles | 59.88 | 88.98 | 18.64 | 58.73 | 56.56 |
| 41 | KPRC | NBC | 15 | Houston | 56.06 | 76.69 | 35.59 | 57.39 | 56.43 |
| 42 | WCPO | CBS | 20 | Cincinnati | 51.99 | 67.78 | 30.51 | 74.50 | 56.19 |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| 43 | WMAQ | NBC | 3 | Chicago | 51.91 | 94.00 | 15.25 | 63.50 | 56.17 |
| 44 | KOVR | ABC | 27 | Sacramento-Stockton | 21.12 | 48.07 | 57.63 | 95.72 | 55.63 |
| 45 | WITI | ABC | 21 | Milwaukee | 42.83 | 51.02 | 57.63 | 71.01 | 55.62 |
| 46 | WCAU | CBS | 4 | Philadelphia | 51.59 | 87.49 | 18.64 | 64.06 | 55.45 |
| 47 | WSYR | NBC | 43 | Syracuse | 28.69 | 44.22 | 59.32 | 89.36 | 55.40 |
| 48 | WBAL | NBC | 19 | Baltimore | 60.00 | 72.80 | 32.20 | 56.53 | 55.38 |
| 49 | WBRC | ABC | 38 | Birmingham | 59.40 | 84.55 | 44.07 | 33.19 | 55.30 |
| 50 | WPVI | ABC | 4 | Philadelphia | 61.95 | 65.60 | 23.73 | 69.78 | 55.25 |
| 51 | WPRI | CBS | 34 | Providence | 29.08 | 56.25 | 81.36 | 53.84 | 55.13 |
| 52 | WAPI | NBC | 38 | Birmingham | 26.29 | 68.98 | 57.63 | 65.28 | 54.55 |
| 53 | KUTV | NBC | 50 | Salt Lake City | 38.09 | 53.27 | 38.98 | 86.50 | 54.36 |
| 54 | KWTV | CBS | 41 | Oklahoma City | 41.75 | 61.13 | 37.29 | 76.97 | 54.29 |
| 55 | WTOP | CBS | 10 | Washington D.C | 41.55 | 86.29 | 20.34 | 68.87 | 54.26 |
| 56 | WCKT | NBC | 18 | Miami | 42.83 | 75.13 | 45.76 | 53.17 | 54.22 |
| 57 | WSOC | NBC | 35 | Charlotte | 27.00 | 62.07 | 57.63 | 69.27 | 54.02 |
| 58 | WOAI | NBC | 45 | San Antonio | 47.61 | 59.64 | 50.85 | 57.68 | 53.94 |
| 59 | KSTP | NBC | 13 | Minneapolis-St. Paul | 51.43 | 50.02 | 40.68 | 64.23 | 53.84 |
| 60 | WAGA | CBS | 17 | Atlanta | 43.55 | 90.76 | 18.64 | 62.22 | 53.79 |
| 61 | WSIX | ABC | 30 | Nashville | 39.04 | 45.71 | 50.85 | 78.61 | 53.55 |
| 62 | WOTV | NBC | 41 | Kalamazoo-Gr Rapids | 50.04 | 71.20 | 27.12 | 61.84 | 53.30 |
| 63 | WXII | NBC | 48 | Gnsb-High Pt-Win Sal | 28.49 | 52.95 | 52.54 | 78.69 | 53.17 |
| 64 | KTRK | ABC | 15 | Houston | 60.44 | 55.93 | 38.98 | 56.63 | 53.00 |
| 65 | WLWI | ABC | 14 | Indianapolis | 45.22 | 76.00 | 16.95 | 72.96 | 52.78 |
| 66 | KSD | NBC | 12 | St. Louis | 54.58 | 64.36 | 37.29 | 54.30 | 52.63 |
| 67 | WTVJ | CBS | 18 | Miami | 32.03 | 59.67 | 49.15 | 69.67 | 52.63 |
| 68 | KTVI | ABC | 12 | St. Louis | 37.65 | 37.89 | 54.24 | 80.02 | 52.45 |
| 69 | WWJ | NBC | 5 | Detroit | 64.10 | 73.09 | 16.95 | 53.88 | 52.01 |
| 70 | KHOU | CBS | 15 | Houston | 58.05 | 73.78 | 25.42 | 50.57 | 51.96 |
| 71 | WLCY | ABC | 24 | Tampa-St. Petersburg | 47.01 | 69.16 | 33.90 | 57.18 | 51.81 |
| 72 | WFBC | NBC | 40 | Gnville-Sptnbg-Ashvi | 32.07 | 65.27 | 59.32 | 50.10 | 51.69 |
| 73 | WKBW | ABC | 25 | Buffalo | 41.63 | 52.87 | 57.63 | 54.28 | 51.60 |
| 74 | WTMJ | NBC | 21 | Milwaukee | 62.03 | 58.87 | 27.12 | 58.31 | 51.58 |
| 74 | WBBM | CBS | 3 | Chicago | 54.90 | 81.31 | 5.08 | 65.01 | 51.58 |
| 76 | KGO | ABC | 8 | San Francisco | 35.06 | 63.27 | 30.51 | 75.55 | 51.10 |
| 77 | WJW | CBS | 7 | Cleveland | 43.59 | 69.16 | 28.81 | 62.68 | 51.06 |
| 78 | KSAT | ABC | 45 | San Antonio | 37.05 | 41.49 | 52.54 | 72.90 | 51.00 |
| 79 | WVUE | ABC | 31 | New Orleans | 31.47 | 50.84 | 45.76 | 74.48 | 50.64 |
| 80 | WTVT | CBS | 24 | Tampa-St. Petersburg | 40.76 | 73.09 | 20.34 | 68.32 | 50.63 |
| 81 | WAVY | NBC | 44 | Norf-Newp News-Hamp | 27.29 | 67.09 | 47.46 | 60.33 | 50.54 |
| 82 | WBTV | CBS | 35 | Charlotte | 50.76 | 67.27 | 32.20 | 51.81 | 50.51 |
| 83 | WLWD | NBC | 39 | Dayton | 55.78 | 69.45 | 13.56 | 60.56 | 49.84 |
| 84 | WCCO | CBS | 13 | Minneapolis-St. Paul | 62.55 | 62.36 | 10.17 | 64.08 | 49.79 |
| 85 | WFAA | ABC | 11 | Dallas-Fort Worth | 50.20 | 50.25 | 37.29 | 60.31 | 49.51 |
| 86 | WLAC | CBS | 30 | Nashville | 52.39 | 54.55 | 22.03 | 68.95 | 49.48 |
| 87 | KCMO | CBS | 23 | Kansas City | 48.01 | 63.85 | 28.81 | 57.05 | 49.43 |
| 88 | WTEV | ABC | 34 | Providence | 25.10 | 51.27 | 45.76 | 75.19 | 49.33 |

*Network Affiliates Ranked by Composite of All Programming Criteria*—Continued

| Rank | Call letters | Net. aff. | Mkt. No. | Location | Local | News, PA and other | Commer. | Financial | Composite |
|---|---|---|---|---|---|---|---|---|---|
| 89 | WMC | NBC | 29 | Memphis | 53.71 | 61.71 | 22.03 | 57.87 | 48.83 |
| 90 | WTEN | CBS | 37 | Albany-Schenectady-T | 31.03 | 53.38 | 37.29 | 72.88 | 48.66 |
| 91 | KOCO | ABC | 41 | Oklahoma City | 46.18 | 46.44 | 33.90 | 67.93 | 48.61 |
| 92 | WLKY | ABC | 36 | Louisville | 20.92 | 32.15 | 62.71 | 78.40 | 48.54 |
| 93 | WBAP | NBC | 11 | Dallas-Fort Worth | 24.70 | 67.71 | 47.46 | 53.76 | 48.41 |
| 94 | WJAR | NBC | 34 | Providence | 29.48 | 68.25 | 37.29 | 57.91 | 48.23 |
| 95 | WTNH | ABC | 22 | Hartford-New Haven | 30.48 | 61.56 | 40.68 | 50.88 | 48.15 |
| 96 | KFMB | CBS | 49 | San Diego | 49.00 | 77.60 | 15.25 | 50.55 | 48.10 |
| 97 | KTVK | ABC | 45 | Phoenix | 37.29 | 47.16 | 44.07 | 63.50 | 48.00 |
| 98 | WTOL | CBS | 45 | Toledo | 37.49 | 63.27 | 38.98 | 51.36 | 47.78 |
| 99 | KMGH | CBS | 32 | Denver | 51.00 | 62.65 | 20.34 | 56.99 | 47.74 |
| 100 | WDHO | ABC | 45 | Toledo | 18.69 | 27.05 | 69.49 | 75.59 | 47.70 |
| 101 | KDFW | CBS | 11 | Dallas-Fort Worth | 56.97 | 72.69 | 18.64 | 41.83 | 47.54 |
| 102 | KABC | ABC | 2 | Los Angeles | 26.69 | 50.11 | 32.20 | 80.71 | 47.43 |
| 103 | WHNB | NBC | 22 | Hartford-New Haven | 28.92 | 76.40 | 38.98 | 45.03 | 47.33 |
| 104 | WISH | CBS | 14 | Indianapolis | 42.50 | 64.55 | 35.59 | 45.44 | 47.04 |
| 105 | KXTV | CBS | 27 | Sacramento-Stockton | 33.07 | 71.31 | 18.64 | 64.86 | 46.97 |
| 106 | WAVE | NBC | 36 | Louisville | 34.46 | 60.11 | 32.20 | 60.29 | 46.77 |
| 107 | WNYS | ABC | 43 | Syracuse | 8.17 | 29.67 | 67.80 | 80.67 | 46.58 |
| 108 | WHEN | CBS | 43 | Syracuse | 26.06 | 59.49 | 32.20 | 67.86 | 46.40 |
| 109 | KCPX | ABC | 50 | Salt Lake City | 16.57 | 39.89 | 57.63 | 71.18 | 46.32 |
| 110 | WHTN | ABC | 38 | Charleston-Huntington | 17.93 | 52.80 | 57.63 | 56.53 | 46.22 |
| 111 | WLOS | ABC | 40 | Gnville-Sptnbg-Ashvi | 15.62 | 39.71 | 61.02 | 66.73 | 45.77 |
| 112 | KGTV | NBC | 49 | San Diego | 30.88 | 54.18 | 32.20 | 65.74 | 45.75 |
| 113 | KOA | NBC | 32 | Denver | 48.01 | 61.85 | 25.42 | 46.35 | 45.41 |
| 114 | KIRO | CBS | 16 | Seattle-Tacoma | 44.82 | 60.62 | 25.42 | 50.76 | 45.40 |
| 115 | WLS | ABC | 3 | Chicago | 48.13 | 65.85 | 1.69 | 64.53 | 45.05 |
| 116 | WKYC | NBC | 7 | Cleveland | 30.28 | 60.00 | 18.64 | 70.28 | 44.80 |
| 117 | WXYZ | ABC | 5 | Detroit | 37.05 | 49.89 | 15.25 | 76.74 | 44.73 |
| 118 | WRGB | NBC | 37 | Albany-Schenectady-T | 33.27 | 47.67 | 47.46 | 50.19 | 44.65 |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| 119 | WSPD | NBC | 45 | Toledo | 26.69 | 50.80 | 45.76 | 54.53 | 44.45 |
| 120 | WKRC | ABC | 20 | Cincinnati | 42.35 | 39.64 | 49.15 | 45.97 | 44.28 |
| 121 | WCHS | CBS | 33 | Charleston-Huntingto | 38.17 | 41.05 | 54.24 | 43.12 | 44.14 |
| 122 | KMSP | ABC | 13 | Minneapolis-St. Paul | 31.16 | 34.73 | 59.32 | 50.67 | 43.97 |
| 123 | WGR | NBC | 25 | Buffalo | 16.73 | 51.45 | 45.76 | 61.52 | 43.87 |
| 124 | WSAZ | NBC | 33 | Charleston-Huntingto | 27.49 | 66.51 | 37.29 | 43.89 | 43.79 |
| 125 | WEWS | ABC | 7 | Cleveland | 36.22 | 40.36 | 30.51 | 67.80 | 43.72 |
| 126 | WHIO | CBS | 39 | Dayton | 50.92 | 46.76 | 15.25 | 59.84 | 43.19 |
| 127 | WELA | NBC | 24 | Tampa-St. Petersburg | 27.29 | 67.49 | 15.25 | 62.45 | 43.12 |
| 128 | WREC | CBS | 29 | Memphis | 24.90 | 52.29 | 40.68 | 53.82 | 42.92 |
| 129 | WSPA | CBS | 40 | Gnville-Sptnbg-Ashvi | 32.39 | 66.55 | 20.34 | 51.39 | 42.67 |
| 130 | KENS | CBS | 45 | San Antonio | 31.59 | 58.11 | 33.90 | 45.82 | 42.36 |
| 131 | WLWC | NBC | 28 | Columbus | 33.27 | 64.36 | 18.64 | 53.00 | 42.32 |
| 132 | WISN | CBS | 21 | Milwaukee | 34.22 | 55.38 | 18.64 | 60.68 | 42.23 |
| 133 | WJBK | CBS | 5 | Detroit | 35.46 | 55.31 | 22.03 | 54.91 | 41.93 |
| 134 | WDAF | NBC | 23 | Kansas City | 54.86 | 62.87 | 0.0 | 47.40 | 41.28 |
| 135 | KMBC | ABC | 23 | Kansas City | 32.47 | 40.91 | 32.20 | 57.93 | 40.88 |
| 136 | WTVN | ABC | 28 | Columbus | 25.70 | 42.36 | 38.98 | 55.14 | 40.55 |
| 137 | WVEC | ABC | 44 | Norf-Newp News-Hamp | 18.96 | 40.00 | 45.76 | 57.28 | 40.50 |
| 138 | WKZO | CBS | 41 | Kalamazoo-Grand Rapids | 31.27 | 55.27 | 32.20 | 40.83 | 39.89 |
| 139 | WBMG | CBS | 38 | Birmingham | 26.37 | 49.38 | 44.07 | 37.89 | 39.43 |
| 140 | KOOL | CBS | 45 | Phoenix | 34.22 | 62.00 | 6.78 | 52.90 | 38.97 |
| 141 | WHBQ | ABC | 29 | Memphis | 18.92 | 38.55 | 44.07 | 53.90 | 38.86 |
| 142 | KBTV | ABC | 32 | Denver | 36.77 | 43.02 | 1.69 | 70.42 | 37.98 |
| 143 | WQXI | ABC | 17 | Atlanta | 25.22 | 44.76 | 23.73 | 56.86 | 37.64 |
| 144 | WCCB | ABC | 35 | Charlotte | 21.91 | 42.55 | 33.90 | 45.00 | 35.84 |

### *Network Affiliates Ranked by Composite of All Programming Criteria*

| Rank | Call letters | Net. aff. | Mkt. No. | Location | Local | News, PA and other | Commer. | Financial |
|---|---|---|---|---|---|---|---|---|
| 39 | WNBC | NBC | 1 | New York City | 60 | 17 | 88 | 58 |
| 13 | WABC | ABC | 1 | New York City | 63 | 77 | 49 | 1 |
| 26 | WCBS | CBS | 1 | New York City | 75 | 4 | 108 | 27 |
| 14 | WNBC | NBC | 2 | Los Angeles | 3 | 3 | 138 | 35 |
| 102 | KABC | ABC | 2 | Los Angeles | 123 | 115 | 88 | 17 |
| 40 | KNXT | CBS | 2 | Los Angeles | 21 | 8 | 121 | 88 |
| 74 | WBBM | CBS | 3 | Chicago | 33 | 18 | 141 | 65 |
| 43 | WMAO | NBC | 3 | Chicago | 41 | 2 | 132 | 74 |
| 115 | WLS | ABC | 3 | Chicago | 53 | 61 | 142 | 68 |
| 50 | WPVI | ABC | 4 | Philadelphia | 14 | 62 | 112 | 45 |
| 46 | WCAU | CBS | 4 | Philadelphia | 42 | 9 | 121 | 73 |
| 5 | KYW | NBC | 4 | Philadelphia | 2 | 7 | 23 | 123 |
| 69 | WWJ | NBC | 5 | Detroit | 9 | 31 | 129 | 112 |
| 117 | WXYZ | ABC | 5 | Detroit | 89 | 116 | 132 | 26 |
| 133 | WJBK | CBS | 5 | Detroit | 93 | 99 | 114 | 106 |
| 17 | WNAC | ABC | 6 | Boston | 37 | 41 | 24 | 59 |
| 31 | WBZ | NBC | 6 | Boston | 15 | 16 | 49 | 138 |
| 125 | WEWS | ABC | 7 | Cleveland | 92 | 134 | 98 | 56 |
| 77 | WJW | CBS | 7 | Cleveland | 69 | 43 | 101 | 77 |
| 116 | WKYC | NBC | 7 | Cleveland | 113 | 86 | 121 | 43 |
| 76 | KGO | ABC | 8 | San Francisco | 94 | 70 | 98 | 30 |
| 1 | KPIX | CBS | 8 | San Francisco | 31 | 13 | 1 | 103 |
| 8 | WTAE | ABC | 9 | Pittsburgh | 52 | 60 | 10 | 15 |
| 4 | KDKA | CBS | 9 | Pittsburgh | 4 | 6 | 30 | 57 |
| 15 | WIIC | NBC | 9 | Pittsburgh | 17 | 53 | 101 | 8 |
| 7 | WMAL | ABC | 10 | Washington D.C | 28 | 40 | 41 | 9 |
| 55 | WTOP | CBS | 10 | Washington D.C | 79 | 10 | 117 | 50 |
| 12 | WRC | NBC | 10 | Washington D.C | 49 | 15 | 101 | 7 |
| 85 | WFAA | ABC | 11 | Dallas-Fort Worth | 47 | 114 | 70 | 85 |
| 101 | KDFW | CBS | 11 | Dallas-Fort Worth | 26 | 34 | 121 | 141 |
| 93 | WBAP | NBC | 11 | Dallas-Fort Worth | 132 | 50 | 36 | 115 |
| 27 | KMOX | CBS | 12 | St. Louis | 59 | 11 | 101 | 36 |
| 66 | KSD | NBC | 12 | St. Louis | 36 | 68 | 70 | 108 |
| 68 | KIVI | ABC | 12 | St. Louis | 86 | 140 | 24 | 19 |
| 84 | WCCO | CBS | 13 | Minneapolis-St. Paul | 12 | 74 | 139 | 72 |
| 122 | KMSP | ABC | 13 | Minneapolis-St. Paul | 109 | 141 | 13 | 126 |
| 59 | KSTP | NBC | 13 | Minneapolis-St. Paul | 43 | 91 | 57 | 71 |
| 65 | WLWI | ABC | 14 | Indianapolis | 64 | 26 | 129 | 37 |
| 104 | WISH | CBS | 14 | Indianapolis | 73 | 65 | 78 | 135 |
| 37 | WRTV | NBC | 14 | Indianapolis | 64 | 39 | 36 | 64 |
| 70 | KHOU | CBS | 15 | Houston | 25 | 30 | 108 | 127 |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| 64 | KIRK | ABC | 15 | Houston | 13 | 95 | 63 | 100 |
| 41 | KPRC | NBC | 15 | Houston | 29 | 22 | 78 | 94 |
| 114 | KIRO | CBS | 16 | Seattle-Tacoma | 66 | 83 | 108 | 125 |
| 24 | KOMO | ABC | 16 | Seattle-Tacoma | 32 | 66 | 57 | 28 |
| 3 | KING | NBC | 16 | Seattle-Tacoma | 76 | 48 | 6 | 3 |
| 31 | WSB | NBC | 17 | Atlanta | 5 | 56 | 49 | 116 |
| 143 | WQXI | ABC | 17 | Atlanta | 129 | 126 | 112 | 99 |
| 60 | WAGA | CBS | 17 | Atlanta | 70 | 5 | 121 | 79 |
| 66 | WTVJ | CBS | 18 | Miami | 105 | 87 | 33 | 46 |
| 56 | WCKT | NBC | 18 | Miami | 71 | 27 | 41 | 117 |
| 6 | WPLG | ABC | 18 | Miami | 10 | 1 | 81 | 52 |
| 48 | WBAL | NBC | 19 | Baltimore | 19 | 33 | 88 | 101 |
| 2 | WJZ | ABC | 19 | Baltimore | 6 | 59 | 4 | 24 |
| 34 | WMAR | CBS | 19 | Baltimore | 11 | 25 | 78 | 104 |
| 25 | WLWT | NBC | 20 | Cincinnati | 1 | 118 | 129 | 44 |
| 120 | WKRC | ABC | 20 | Cincinnati | 74 | 138 | 33 | 133 |
| 42 | WCPO | CBS | 20 | Cincinnati | 40 | 49 | 98 | 33 |
| 74 | WIMJ | NBC | 21 | Milwaukee | 13 | 92 | 106 | 89 |
| 132 | WISN | CBS | 21 | Milwaukee | 97 | 98 | 121 | 82 |
| 45 | WITI | ABC | 21 | Milwaukee | 71 | 111 | 16 | 41 |
| 16 | WTIC | CBS | 22 | Hartford-New Haven | 68 | 28 | 5 | 110 |
| 95 | WINH | ABC | 22 | Hartford-New Haven | 81 | 81 | 57 | 124 |
| 103 | WHNB | NBC | 22 | Hartford-New Haven | 116 | 23 | 63 | 135 |
| 135 | KMBC | ABC | 23 | Kansas City | 102 | 133 | 88 | 90 |
| 134 | WDAF | NBC | 23 | Kansas City | 34 | 72 | 144 | 131 |
| 87 | KCMO | CBS | 23 | Kansas City | 54 | 69 | 101 | 97 |
| 80 | WIVT | CBS | 24 | Tampa-St. Petersburg | 80 | 31 | 117 | 51 |
| 127 | WFLA | NBC | 24 | Tampa-St. Petersburg | 120 | 51 | 132 | 78 |
| 71 | WLCY | ABC | 24 | Tampa-St. Petersburg | 60 | 43 | 81 | 96 |
| 73 | WKBW | ABC | 25 | Buffalo | 78 | 106 | 16 | 109 |
| 123 | WGR | NBC | 25 | Buffalo | 141 | 109 | 41 | 81 |
| 38 | WBEN | CBS | 25 | Buffalo | 54 | 21 | 57 | 80 |
| 18 | KATU | ABC | 26 | Portland | 49 | 96 | 24 | 13 |
| 10 | KGW | NBC | 26 | Portland | 67 | 35 | 49 | 2 |
| 21 | KOIN | CBS | 26 | Portland | 84 | 29 | 57 | 12 |
| 44 | KOVR | ABC | 27 | Sacramento-Stockton | 134 | 120 | 16 | 5 |
| 105 | KXTV | CBS | 27 | Sacramento-Stockton | 101 | 36 | 121 | 66 |
| 20 | KCRA | NBC | 27 | Sacramento-Stockton | 27 | 14 | 70 | 69 |
| 136 | WTVN | ABC | 28 | Columbus | 128 | 130 | 63 | 105 |
| 131 | WLWC | NBC | 28 | Columbus | 99 | 66 | 121 | 118 |
| 22 | WBNS | CBS | 28 | Columbus | 22 | 19 | 81 | 61 |
| 141 | WHBQ | ABC | 29 | Memphis | 138 | 139 | 49 | 111 |
| 89 | WMC | NBC | 29 | Memphis | 38 | 80 | 114 | 92 |
| 128 | WREC | CBS | 29 | Memphis | 131 | 108 | 57 | 114 |
| 61 | WSIX | ABC | 30 | Nashville | 82 | 125 | 30 | 22 |
| 86 | WLAC | CBS | 30 | Nashville | 39 | 101 | 114 | 49 |
| 28 | WSM | NBC | 30 | Nashville | 24 | 97 | 63 | 16 |
| 11 | WWL | CBS | 31 | New Orleans | 7 | 24 | 70 | 31 |
| 79 | WVUE | ABC | 31 | New Orleans | 107 | 112 | 41 | 34 |

*Network Affiliates Ranked by Composite of All Programming Criteria*—Con.

| Rank | Call letters | Net. aff. | Mkt. No. | Location | Local | News, PA and other | Commer. | Financial |
|---|---|---|---|---|---|---|---|---|
| 36 | WDSU | NBC | 31 | New Orleans | 20 | 55 | 81 | 55 |
| 99 | KMGH | CBS | 32 | Denver | 44 | 73 | 117 | 98 |
| 142 | KBTV | ABC | 32 | Denver | 91 | 128 | 142 | 42 |
| 113 | KOA | NBC | 32 | Denver | 54 | 79 | 108 | 132 |
| 124 | WSAZ | NBC | 33 | Charleston-Huntington | 119 | 58 | 70 | 139 |
| 121 | WCHS | CBS | 33 | Charleston-Huntington | 85 | 132 | 21 | 140 |
| 110 | WHTN | ABC | 33 | Charleston-Huntington | 140 | 137 | 16 | 101 |
| 88 | WTEV | ABC | 34 | Providence | 130 | 110 | 41 | 32 |
| 94 | WJAR | NBC | 34 | Providence | 114 | 47 | 70 | 91 |
| 51 | WPRI | CBS | 34 | Providence | 115 | 94 | 3 | 113 |
| 57 | WSOC | NBC | 35 | Charlotte | 122 | 75 | 16 | 47 |
| 144 | WCCB | ABC | 35 | Charlotte | 133 | 129 | 81 | 137 |
| 82 | WBTV | CBS | 35 | Charlotte | 46 | 52 | 88 | 120 |
| 19 | WHAS | CBS | 36 | Louisville | 35 | 84 | 33 | 20 |
| 106 | WAVE | NBC | 36 | Louisville | 95 | 85 | 88 | 86 |
| 92 | WLKY | ABC | 36 | Louisville | 136 | 142 | 11 | 23 |
| 90 | WTEN | CBS | 37 | Albany-Schenectady-T | 110 | 103 | 70 | 39 |
| 30 | WAST | ABC | 37 | Albany-Schenectady-T | 135 | 119 | 8 | 4 |
| 118 | WRGB | NBC | 37 | Albany-Schenectady-T | 99 | 121 | 36 | 129 |
| 52 | WAPI | NBC | 38 | Birmingham | 126 | 46 | 16 | 63 |
| 49 | WBRC | ABC | 38 | Birmingham | 23 | 12 | 49 | 144 |
| 139 | WBMG | CBS | 38 | Birmingham | 125 | 117 | 49 | 143 |
| 126 | WHIO | CBS | 39 | Dayton | 45 | 123 | 132 | 87 |
| 83 | WLWD | NBC | 39 | Dayton | 30 | 42 | 137 | 83 |
| 129 | WSPA | CBS | 40 | Gnville-Sptnbg-Ashvi | 103 | 57 | 117 | 121 |
| 72 | WFBC | NBC | 40 | Gnville-Sptnbg-Ashvi | 104 | 63 | 13 | 130 |
| 111 | WLOS | ABC | 40 | Gnville-Sptnbg-Ashvi | 143 | 137 | 12 | 59 |
| 35 | WZZM | ABC | 41 | Kalamazoo-Gr Rapids | 112 | 45 | 41 | 14 |
| 138 | WKZO | CBS | 41 | Kalamazoo-Gr Rapids | 108 | 100 | 88 | 142 |
| 62 | WOTV | NBC | 41 | Kalamazoo-Gr Rapids | 48 | 37 | 106 | 67 |
| 54 | KWTV | CBS | 41 | Oklahoma City | 77 | 82 | 70 | 25 |
| 29 | WKY | NBC | 41 | Oklahoma City | 16 | 77 | 36 | 70 |
| 91 | KOCO | ABC | 41 | Oklahoma City | 62 | 124 | 81 | 53 |
| 108 | WHEN | CBS | 43 | Syracuse | 127 | 89 | 88 | 54 |
| 47 | WSYR | NBC | 43 | Syracuse | 117 | 127 | 13 | 10 |
| 107 | WNYS | ABC | 43 | Syracuse | 144 | 143 | 8 | 18 |
| 137 | WVEC | ABC | 44 | Norf-Newp News-Hamp | 137 | 135 | 41 | 95 |
| 81 | WAVY | NBC | 44 | Norf-Newp News-Hamp | 120 | 54 | 36 | 84 |
| 23 | KTAR | NBC | 45 | Phoenix | 8 | 64 | 63 | 47 |
| 97 | KTVK | ABC | 45 | Phoenix | 88 | 122 | 49 | 74 |
| 140 | KOOL | CBS | 45 | Phoenix | 97 | 76 | 140 | 119 |
| 78 | KSAT | ABC | 45 | San Antonio | 89 | 131 | 28 | 38 |
| 58 | WOAI | NBC | 45 | San Antonio | 58 | 88 | 30 | 93 |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| 130 | KENS | CBS | 45 | San Antonio | 106 | 93 | 81 | 134 |
| 100 | WDHO | ABC | 45 | Toledo | 139 | 144 | 6 | 29 |
| 119 | WSPD | NBC | 45 | Toledo | 123 | 113 | 41 | 107 |
| 98 | WTOL | CBS | 45 | Toledo | 87 | 70 | 63 | 122 |
| 63 | WXII | NBC | 48 | Gnsb-High Pt-Win Sal | 118 | 105 | 28 | 21 |
| 9 | WFMY | CBS | 48 | Gnsb-High Pt-Win Sal | 95 | 38 | 2 | 76 |
| 96 | KFMB | CBS | 49 | San Diego | 51 | 20 | 132 | 128 |
| 112 | KGTV | NBC | 49 | San Diego | 111 | 102 | 88 | 62 |
| 109 | KCPX | ABC | 50 | Salt Lake City | 142 | 136 | 16 | 40 |
| 33 | KSL | CBS | 50 | Salt Lake City | 57 | 90 | 88 | 6 |
| 53 | KUTV | NBC | 50 | Salt Lake City | 83 | 104 | 63 | 11 |

*Network Affiliates Ranked by Total Hours of News, Public Affairs, and "Other" in Composite Week*

| Rank | Call letters | Net aff. | Mkt. No | Location | News | Rank | Pub. affairs | Rank | Other | Rank | Composite |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 17 | WNBC | NBC | 1 | New York City | 15.08 | 39 | 11.13 | 6 | 11.08 | 66 | 37.300 |
| 77 | WABC | ABC | 1 | New York City | 10.58 | 98 | 5.37 | 52 | 12.42 | 40 | 28.367 |
| 4 | WCBS | CBS | 1 | New York City | 16.13 | 27 | 4.10 | 83 | 21.72 | 1 | 41.950 |
| 3 | KNBC | NBC | 2 | Los Angeles | 22.00 | 1 | 10.03 | 9 | 10.78 | 70 | 42.817 |
| 115 | KABC | ABC | 2 | Los Angeles | 9.75 | 110 | 4.83 | 62 | 8.38 | 111 | 22.967 |
| 8 | KNXT | CBS | 2 | Los Angeles | 17.05 | 19 | 4.10 | 84 | 19.63 | 5 | 40.783 |
| 18 | WBBM | CBS | 3 | Chicago | 14.28 | 49 | 5.57 | 48 | 17.42 | 9 | 37.267 |
| 2 | WMAQ | NBC | 3 | Chicago | 19.98 | 4 | 9.10 | 15 | 14.00 | 21 | 43.083 |
| 61 | WLS | ABC | 3 | Chicago | 9.50 | 114 | 7.25 | 28 | 13.43 | 30 | 30.183 |
| 62 | WPVI | ABC | 4 | Philadelphia | 9.32 | 117 | 9.25 | 14 | 11.50 | 57 | 30.067 |
| 9 | WCAU | CBS | 4 | Philadelphia | 16.37 | 25 | 3.62 | 98 | 20.12 | 3 | 40.100 |
| 7 | KYW | NBC | 4 | Philadelphia | 18.55 | 6 | 11.43 | 3 | 10.88 | 69 | 40.817 |
| 31 | WWJ | NBC | 5 | Detroit | 14.80 | 42 | 4.75 | 66 | 13.95 | 22 | 33.500 |
| 116 | WXYZ | ABC | 5 | Detroit | 10.30 | 103 | 3.82 | 93 | 8.75 | 104 | 22.867 |
| 99 | WJBK | CBS | 5 | Detroit | 10.05 | 107 | 3.28 | 110 | 12.02 | 50 | 25.350 |
| 41 | WNAC | ABC | 6 | Boston | 11.43 | 84 | 11.17 | 4 | 9.38 | 95 | 31.983 |
| 16 | WBZ | NBC | 6 | Boston | 18.53 | 7 | 7.78 | 19 | 11.17 | 64 | 37.483 |
| 134 | WEWS | ABC | 7 | Cleveland | 8.12 | 128 | 2.03 | 137 | 8.35 | 112 | 18.500 |
| 43 | WJW | CBS | 7 | Cleveland | 11.57 | 81 | 3.43 | 104 | 16.70 | 13 | 31.700 |
| 86 | WKYC | NBC | 7 | Cleveland | 11.73 | 76 | 5.15 | 56 | 10.62 | 75 | 27.500 |
| 70 | KGO | ABC | 8 | San Francisco | 10.05 | 108 | 11.15 | 5 | 7.80 | 121 | 29.000 |
| 13 | KPIX | CBS | 8 | San Francisco | 16.62 | 23 | 10.72 | 8 | 11.37 | 59 | 38.700 |
| 60 | WTAE | ABC | 9 | Pittsburgh | 11.82 | 75 | 9.63 | 12 | 8.75 | 105 | 30.200 |
| 6 | KDKA | CBS | 9 | Pittsburgh | 20.20 | 2 | 7.13 | 31 | 13.50 | 27 | 40.833 |
| 53 | WIIC | NBC | 9 | Pittsburgh | 17.55 | 13 | 4.83 | 64 | 8.40 | 110 | 30.783 |
| 40 | WMAL | ABC | 10 | Washington, D.C | 10.43 | 101 | 7.67 | 20 | 14.25 | 20 | 32.350 |
| 10 | WTOP | CBS | 10 | Washington, D.C | 17.12 | 17 | 9.92 | 10 | 12.52 | 38 | 39.550 |
| 15 | WRC | NBC | 10 | Washington D.C | 14.83 | 41 | 9.37 | 13 | 13.78 | 23 | 37.983 |
| 114 | WFAA | ABC | 11 | Dallas-Fort Worth | 12.62 | 69 | 3.25 | 112 | 7.17 | 131 | 23.033 |

*Network Affiliates Ranked by Total Hours of News, Public Affairs, and "Other" in Composite Week*—Continued

| Rank | Call letters | Net aff. | Mkt. No | Location | News | Rank | Pub. affairs | Rank | Other | Rank | Composite |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 34 | KDFW | CBS | 11 | Dallas-Fort Worth | 16.65 | 22 | 3.22 | 113 | 13.45 | 28 | 33.317 |
| 50 | WBAP | NBC | 11 | Dallas-Fort Worth | 15.92 | 29 | 7.22 | 30 | 7.90 | 119 | 31.033 |
| 11 | KMOX | CBS | 12 | St. Louis | 16.25 | 26 | 4.70 | 68 | 18.22 | 8 | 39.167 |
| 68 | KSD | NBC | 12 | St. Louis | 17.47 | 14 | 6.05 | 40 | 5.98 | 138 | 29.500 |
| 140 | KTVI | ABC | 12 | St. Louis | 6.15 | 138 | 2.55 | 124 | 8.67 | 107 | 17.367 |
| 74 | WCCO | CBS | 13 | Minneapolis-St. Paul | 13.50 | 58 | 3.88 | 91 | 11.20 | 63 | 28.583 |
| 141 | KMSP | ABC | 13 | Minneapolis-St. Paul | 8.20 | 126 | 2.03 | 138 | 5.68 | 139 | 15.917 |
| 91 | KSTP | NBC | 13 | Minneapolis-St. Paul | 14.10 | 51 | 5.62 | 46 | 7.33 | 127 | 27.050 |
| 26 | WLWI | ABC | 14 | Indianapolis | 8.17 | 127 | 6.83 | 32 | 19.83 | 4 | 34.833 |
| 65 | WISH | CBS | 14 | Indianapolis | 18.42 | 8 | 2.50 | 126 | 8.67 | 108 | 29.583 |
| 39 | WRTV | NBC | 14 | Indianapolis | 12.62 | 70 | 7.47 | 22 | 12.33 | 43 | 32.417 |
| 30 | KHOU | CBS | 15 | Houston | 14.65 | 44 | 8.70 | 16 | 10.47 | 83 | 33.817 |
| 95 | KTRK | ABC | 15 | Houston | 10.97 | 91 | 4.85 | 61 | 9.82 | 89 | 25.633 |
| 22 | KPRC | NBC | 15 | Houston | 15.80 | 32 | 7.32 | 27 | 12.03 | 49 | 35.150 |
| 83 | KIRO | CBS | 16 | Seattle-Tacoma | 14.23 | 50 | 4.40 | 76 | 9.15 | 98 | 27.783 |
| 66 | KOMO | ABC | 16 | Seattle-Tacoma | 12.88 | 66 | 5.30 | 53 | 11.32 | 61 | 29.500 |
| 48 | KING | NBC | 16 | Seattle-Tacoma | 13.48 | 61 | 4.50 | 72 | 13.25 | 32 | 31.233 |
| 56 | WSB | NBC | 17 | Atlanta | 17.40 | 15 | 4.10 | 85 | 9.22 | 97 | 30.717 |
| 126 | WQXI | ABC | 17 | Atlanta | 9.22 | 120 | 4.08 | 86 | 7.22 | 130 | 20.517 |
| 5 | WAGA | CBS | 17 | Atlanta | 17.72 | 12 | 4.97 | 59 | 18.92 | 6 | 41.600 |
| 87 | WTVJ | CBS | 18 | Miami | 12.05 | 73 | 5.07 | 58 | 10.23 | 85 | 27.350 |
| 27 | WCKT | NBC | 18 | Miami | 14.37 | 46 | 7.38 | 25 | 12.68 | 37 | 34.433 |
| 1 | WPLG | ABC | 18 | Miami | 17.90 | 9 | 11.12 | 7 | 16.82 | 12 | 45.833 |
| 33 | WBAL | NBC | 19 | Baltimore | 14.07 | 52 | 4.45 | 75 | 14.85 | 19 | 33.367 |
| 59 | WJZ | ABC | 19 | Baltimore | 11.58 | 79 | 11.90 | 2 | 6.85 | 133 | 30.333 |
| 25 | WMAR | CBS | 19 | Baltimore | 15.07 | 40 | 6.33 | 35 | 13.52 | 26 | 34.917 |
| 118 | WLWT | NBC | 20 | Cincinnati | 11.00 | 90 | 3.42 | 106 | 7.92 | 117 | 22.333 |
| 138 | WKRC | ABC | 20 | Cincinnati | 5.88 | 140 | 2.50 | 127 | 9.78 | 91 | 18.167 |
| 49 | WCPO | CBS | 20 | Cincinnati | 11.27 | 88 | 3.28 | 111 | 16.52 | 14 | 31.067 |
| 92 | WTMJ | NBC | 21 | Milwaukee | 12.40 | 71 | 4.08 | 87 | 10.50 | 80 | 26.983 |
| 98 | WISN | CBS | 21 | Milwaukee | 10.23 | 104 | 2.80 | 121 | 12.35 | 42 | 25.383 |
| 111 | WITI | ABC | 21 | Milwaukee | 9.55 | 113 | 3.43 | 105 | 10.40 | 84 | 23.383 |
| 28 | WTIC | CBS | 22 | Hartford-New Haven | 13.58 | 56 | 5.18 | 55 | 15.60 | 18 | 34.367 |
| 81 | WTNH | ABC | 22 | Hartford-New Haven | 8.87 | 121 | 12.92 | 1 | 6.43 | 136 | 28.217 |
| 23 | WHNB | NBC | 22 | Hartford-New Haven | 15.20 | 36 | 6.27 | 37 | 13.55 | 25 | 35.017 |
| 133 | KMBC | ABC | 23 | Kansas City | 7.37 | 134 | 2.40 | 132 | 8.98 | 101 | 18.750 |
| 72 | WDAF | NBC | 23 | Kansas City | 17.75 | 11 | 4.18 | 81 | 6.88 | 132 | 28.817 |
| 69 | KCMO | CBS | 23 | Kansas City | 11.72 | 77 | 3.93 | 90 | 13.62 | 24 | 29.267 |
| 32 | WTVT | CBS | 24 | Tampa-St. Petersburg | 16.77 | 20 | 5.22 | 54 | 11.52 | 56 | 33.500 |
| 51 | WFLA | NBC | 24 | Tampa-St. Petersburg | 16.10 | 28 | 2.98 | 119 | 11.85 | 52 | 30.933 |
| 44 | WLCY | ABC | 24 | Tampa-St. Petersburg | 8.08 | 129 | 7.38 | 26 | 16.23 | 15 | 31.700 |
| 106 | WKBW | ABC | 25 | Buffalo | 8.75 | 123 | 5.82 | 43 | 9.67 | 93 | 24.233 |
| 109 | WGR | NBC | 25 | Buffalo | 10.50 | 100 | 4.63 | 70 | 8.45 | 109 | 23.583 |

| | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| 21 | WBEN | CBS | 25 | Buffalo | 15.90 | 30 | 7.45 | 23 | 12.05 | 48 | 35.400 |
| 96 | KATU | ABC | 26 | Portland | 10.85 | 94 | 2.83 | 120 | 11.83 | 53 | 25.517 |
| 35 | KGW | NBC | 26 | Portland | 16.48 | 24 | 5.73 | 44 | 11.05 | 68 | 33.267 |
| 29 | KOIN | CBS | 26 | Portland | 14.03 | 53 | 3.07 | 117 | 17.25 | 10 | 34.350 |
| 120 | KOVR | ABC | 27 | Sacramento-Stockton | 9.57 | 112 | 1.80 | 142 | 10.67 | 73 | 22.033 |
| 36 | KXTV | CBS | 27 | Sacramento-Stockton | 17.22 | 16 | 4.07 | 89 | 11.40 | 58 | 32.683 |
| 14 | KCRA | NBC | 27 | Sacramento-Stockton | 20.15 | 3 | 7.67 | 21 | 10.57 | 77 | 38.383 |
| 130 | WTVN | ABC | 28 | Columbus | 7.42 | 133 | 2.20 | 136 | 9.80 | 90 | 19.417 |
| 67 | WLWC | NBC | 28 | Columbus | 9.33 | 116 | 9.67 | 11 | 10.50 | 81 | 29.500 |
| 19 | WBNS | CBS | 28 | Columbus | 13.60 | 55 | 5.60 | 47 | 16.87 | 11 | 36.067 |
| 139 | WHBQ | ABC | 29 | Memphis | 6.47 | 136 | 2.33 | 134 | 8.87 | 103 | 17.667 |
| 80 | WMC | NBC | 29 | Memphis | 15.82 | 31 | 5.13 | 57 | 7.33 | 128 | 28.283 |
| 108 | WREC | CBS | 29 | Memphis | 11.05 | 89 | 4.17 | 82 | 8.75 | 106 | 23.967 |
| 125 | WSIX | ABC | 30 | Nashville | 5.35 | 141 | 2.65 | 122 | 12.95 | 33 | 20.950 |
| 101 | WLAC | CBS | 30 | Nashville | 10.83 | 95 | 2.33 | 135 | 11.83 | 54 | 25.000 |
| 97 | WSM | NBC | 30 | Nashville | 13.00 | 64 | 4.35 | 77 | 8.17 | 113 | 25.517 |
| 24 | WWL | CBS | 31 | New Orleans | 16.77 | 21 | 5.50 | 49 | 12.70 | 36 | 34.967 |
| 112 | WVUE | ABC | 31 | New Orleans | 10.08 | 106 | 3.32 | 107 | 9.90 | 88 | 23.300 |
| 55 | WDSU | NBC | 31 | New Orleans | 17.12 | 18 | 4.53 | 71 | 9.10 | 100 | 30.750 |
| 73 | KMGH | CBS | 32 | Denver | 11.58 | 80 | 4.32 | 78 | 12.82 | 35 | 28.717 |
| 128 | KBTV | ABC | 32 | Denver | 9.97 | 109 | 3.20 | 115 | 6.55 | 135 | 19.717 |
| 79 | KOA | NBC | 32 | Denver | 14.32 | 48 | 6.17 | 38 | 7.87 | 120 | 28.350 |
| 58 | WSAZ | NBC | 33 | Charleston-Huntington | 14.37 | 47 | 5.38 | 51 | 10.73 | 71 | 30.483 |
| 132 | WCHS | CBS | 33 | Charleston-Huntington | 8.85 | 122 | 2.00 | 139 | 7.97 | 116 | 18.817 |
| 107 | WHTN | ABC | 33 | Charleston-Huntington | 10.22 | 105 | 3.48 | 103 | 10.50 | 82 | 24.200 |
| 110 | WTEV | ABC | 34 | Providence | 11.63 | 78 | 5.65 | 45 | 6.22 | 137 | 23.500 |
| 47 | WJAR | NBC | 34 | Providence | 13.35 | 63 | 7.40 | 24 | 10.53 | 79 | 31.283 |
| 94 | WPRI | CBS | 34 | Providence | 12.98 | 65 | 4.70 | 69 | 8.10 | 115 | 25.783 |
| 75 | WSOC | NBC | 35 | Charlotte | 13.50 | 59 | 4.77 | 65 | 10.18 | 86 | 28.450 |
| 129 | WCCB | ABC | 35 | Charlotte | 5.08 | 142 | 1.90 | 141 | 12.52 | 39 | 19.500 |
| 52 | WBTV | CBS | 35 | Charlotte | 15.13 | 38 | 3.30 | 108 | 12.40 | 41 | 30.833 |
| 84 | WHAS | CBS | 36 | Louisville | 15.27 | 35 | 1.08 | 143 | 11.23 | 62 | 27.583 |
| 85 | WAVE | NBC | 36 | Louisville | 11.47 | 82 | 4.08 | 88 | 12.00 | 51 | 27.550 |
| 142 | WLKY | ABC | 36 | Louisville | 4.53 | 143 | 2.47 | 129 | 7.73 | 122 | 14.733 |
| 103 | WTEN | CBS | 37 | Albany-Schenectady-T | 10.62 | 97 | 3.20 | 114 | 10.65 | 74 | 24.467 |
| 119 | WAST | ABC | 37 | Albany-Schenectady-T | 9.22 | 119 | 3.73 | 96 | 9.30 | 96 | 22.250 |
| 121 | WRGB | NBC | 37 | Albany-Schenectady-T | 11.47 | 83 | 3.00 | 118 | 7.38 | 126 | 21.850 |
| 46 | WAPI | NBC | 38 | Birmingham | 15.63 | 33 | 4.90 | 60 | 11.08 | 67 | 31.617 |
| 12 | WBRC | ABC | 38 | Birmingham | 13.97 | 54 | 6.07 | 39 | 18.72 | 7 | 38.750 |
| 117 | WBMG | CBS | 38 | Birmingham | 7.73 | 132 | 5.40 | 50 | 9.50 | 94 | 22.633 |
| 123 | WHIO | CBS | 39 | Dayton | 8.38 | 125 | 2.45 | 130 | 10.60 | 76 | 21.433 |
| 42 | WLWD | NBC | 39 | Dayton | 11.83 | 74 | 7.92 | 18 | 12.08 | 46 | 31.833 |
| 57 | WSPA | CBS | 40 | Gnville-Sptnbg-Ashvi | 11.82 | 87 | 3.57 | 100 | 15.62 | 17 | 30.500 |
| 63 | WFBC | NBC | 40 | Gnville-Sptnbg-Ashvi | 11.33 | 86 | 7.23 | 29 | 11.35 | 60 | 29.917 |
| 137 | WLOS | ABC | 40 | Gnville-Sptnbg-Ashvi | 8.00 | 130 | 2.62 | 123 | 7.58 | 123 | 18.200 |
| 45 | WZZM | ABC | 41 | Kalamazoo-Gr. Rapids | 6.25 | 137 | 4.30 | 79 | 21.12 | 2 | 31.667 |
| 100 | WKZO | CBS | 41 | Kalamazoo-Gr. Rapids | 8.58 | 124 | 3.30 | 109 | 13.45 | 29 | 25.333 |
| 37 | WOTV | NBC | 41 | Kalamazoo-Gr. Rapids | 14.68 | 43 | 6.42 | 34 | 11.53 | 55 | 32.633 |
| 82 | KWTV | CBS | 41 | Oklahoma City | 12.25 | 72 | 3.55 | 101 | 12.22 | 44 | 28.017 |
| 78 | WKY | NBC | 41 | Oklahoma City | 14.58 | 45 | 5.88 | 42 | 7.90 | 118 | 28.367 |

*Network Affiliates Ranked by Total Hours of News, Public Affairs, and "Other" in Composite Week*—Continued

| Rank | Call letters | Net aff. | Mkt. No | Location | News | Rank | Pub. affairs | Rank | Other | Rank | Composite |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 124 | KOCO | ABC | 41 | Oklahoma City | 8.03 | 131 | 3.58 | 99 | 9.70 | 92 | 21.283 |
| 89 | WHEN | CBS | 43 | Syracuse | 11.37 | 85 | 3.73 | 97 | 12.17 | 45 | 27.267 |
| 127 | WSYR | NBC | 43 | Syracuse | 9.25 | 118 | 3.55 | 102 | 7.47 | 125 | 20.267 |
| 143 | WNYS | ABC | 43 | Syracuse | 6.55 | 135 | 1.93 | 140 | 5.12 | 143 | 13.600 |
| 135 | WVEC | ABC | 44 | Norf-Newp News-Hamp | 10.63 | 96 | 2.43 | 131 | 5.27 | 142 | 18.333 |
| 54 | WAVY | NBC | 44 | Norf-Newp News-Hamp | 13.50 | 60 | 8.15 | 17 | 9.10 | 99 | 30.750 |
| 64 | KTAR | NBC | 45 | Phoenix | 17.85 | 10 | 6.27 | 36 | 5.67 | 140 | 29.783 |
| 122 | KTVK | ABC | 45 | Phoenix | 9.50 | 115 | 4.83 | 63 | 7.28 | 129 | 21.617 |
| 76 | KOOL | CBS | 45 | Phoenix | 15.33 | 34 | 2.52 | 126 | 10.57 | 78 | 28.417 |
| 131 | KSAT | ABC | 45 | San Antonio | 10.95 | 92 | 3.80 | 94 | 4.27 | 144 | 19.017 |
| 88 | WOAI | NBC | 45 | San Antonio | 15.17 | 37 | 6.75 | 33 | 5.42 | 141 | 27.333 |
| 93 | KENS | CBS | 45 | San Antonio | 12.82 | 67 | 3.10 | 116 | 10.72 | 72 | 26.633 |
| 144 | WDHO | ABC | 45 | Toledo | 1.67 | 144 | 0.83 | 144 | 9.90 | 87 | 12.400 |
| 113 | WSPD | NBC | 45 | Toledo | 9.68 | 111 | 2.50 | 128 | 11.10 | 65 | 23.283 |
| 71 | WTOL | CBS | 45 | Toledo | 13.37 | 62 | 2.35 | 133 | 13.28 | 31 | 29.000 |
| 105 | WXII | NBC | 48 | Gnsb-High Pt-Win-Sal | 10.88 | 93 | 4.45 | 74 | 8.93 | 102 | 24.267 |
| 38 | WFMY | CBS | 48 | Gnsb-High Pt-Win-Sal | 12.82 | 68 | 3.87 | 92 | 15.82 | 16 | 32.500 |
| 20 | KFMB | CBS | 49 | San Diego | 19.27 | 5 | 4.22 | 80 | 12.08 | 47 | 35.567 |
| 102 | KGTV | NBC | 49 | San Diego | 13.57 | 57 | 4.50 | 73 | 6.77 | 134 | 24.833 |
| 136 | KCPX | ABC | 50 | Salt Lake City | 6.00 | 139 | 4.75 | 67 | 7.53 | 124 | 18.283 |
| 90 | KSL | CBS | 50 | Salt Lake City | 10.57 | 99 | 3.77 | 95 | 12.92 | 34 | 27.250 |
| 104 | KUTV | NBC | 50 | Salt Lake City | 10.32 | 102 | 5.98 | 41 | 8.12 | 114 | 24.417 |

## *Network Affiliates Ranked by Number of Public Service Announcements in Composite Week*

| Rank | Call letters | Net. aff. | Mkt. No. | Location | PSA's |
|---|---|---|---|---|---|
| 65 | WNBC | NBC | 1 | New York City | 207 |
| 62 | WABC | ABC | 1 | New York City | 214 |
| 22 | WCBS | CBS | 1 | New York City | 287 |
| 99 | KNBC | NBC | 2 | Los Angeles | 169 |
| 43 | KABC | ABC | 2 | Los Angeles | 243 |
| 85 | KNXT | CBS | 2 | Los Angeles | 183 |
| 53 | WBBM | CBS | 3 | Chicago | 231 |
| 101 | WMAQ | NBC | 3 | Chicago | 165 |
| 87 | WLS | ABC | 3 | Chicago | 182 |
| 10 | WPVI | ABC | 4 | Philadelphia | 348 |
| 38 | WCAU | CBS | 4 | Philadelphia | 247 |
| 3 | KYW | NBC | 4 | Philadelphia | 464 |
| 83 | WWJ | NBC | 5 | Detroit | 184 |
| 141 | WXYZ | ABC | 5 | Detroit | 81 |
| 132 | WJBK | CBS | 5 | Detroit | 110 |
| 23 | WNAC | ABC | 6 | Boston | 287 |
| 17 | WBZ | NBC | 6 | Boston | 300 |
| 124 | WEWS | ABC | 7 | Cleveland | 127 |
| 71 | WJW | CBS | 7 | Cleveland | 200 |
| 88 | WKYC | NBC | 7 | Cleveland | 179 |
| 106 | KGO | ABC | 8 | San Francisco | 155 |
| 14 | KPIX | CBS | 8 | San Francisco | 317 |
| 16 | WTAE | ABC | 9 | Pittsburgh | 309 |
| 9 | KDKA | CBS | 9 | Pittsburgh | 364 |
| 57 | WIIC | NBC | 9 | Pittsburgh | 226 |
| 18 | WMAL | ABC | 10 | Washington D.C. | 300 |
| 40 | WTOP | CBS | 10 | Washington D.C. | 246 |
| 96 | WRC | NBC | 10 | Washington D.C. | 173 |
| 67 | WFAA | ABC | 11 | Dallas-Fort Worth | 204 |
| 45 | KDFW | CBS | 11 | Dallas-Fort Worth | 241 |
| 30 | WBAP | NBC | 11 | Dallas-Fort Worth | 265 |
| 49 | KMOX | CBS | 12 | St. Louis | 237 |
| 46 | KSD | NBC | 12 | St. Louis | 241 |
| 137 | KTVI | ABC | 12 | St. Louis | 86 |
| 116 | WCCO | CBS | 13 | Minneapolis-St. Paul | 147 |
| 122 | KMSP | ABC | 13 | Minneapolis-St. Paul | 130 |
| 126 | KSTP | NBC | 13 | Minneapolis-St. Paul | 124 |
| 50 | WLWI | ABC | 14 | Indianapolis | 235 |
| 68 | WISH | CBS | 14 | Indianapolis | 204 |
| 89 | WRTV | NBC | 14 | Indianapolis | 179 |
| 60 | KHOU | CBS | 15 | Houston | 218 |
| 102 | KTRK | ABC | 15 | Houston | 165 |
| 12 | KPRC | NBC | 15 | Houston | 327 |
| 140 | KIRO | CBS | 16 | Seattle-Tacoma | 83 |
| 25 | KOMO | ABC | 16 | Seattle-Tacoma | 285 |
| 133 | KING | NBC | 16 | Seattle-Tacoma | 109 |
| 78 | WSB | NBC | 17 | Atlanta | 191 |
| 44 | WQXI | ABC | 17 | Atlanta | 242 |
| 100 | WAGA | CBS | 17 | Atlanta | 166 |
| 113 | WTVJ | CBS | 18 | Miami | 149 |
| 47 | WCKT | NBC | 18 | Miami | 241 |
| 56 | WPLG | ABC | 18 | Miami | 226 |
| 21 | WBAL | NBC | 19 | Baltimore | 290 |
| 2 | WJZ | ABC | 19 | Baltimore | 495 |
| 41 | WMAR | CBS | 19 | Baltimore | 245 |
| 36 | WLWT | NBC | 20 | Cincinnati | 256 |
| 42 | WKRC | ABC | 20 | Cincinnati | 245 |
| 127 | WCPO | CBS | 20 | Cincinnati | 121 |
| 135 | WTMJ | NBC | 21 | Milwaukee | 103 |
| 58 | WISN | CBS | 21 | Milwaukee | 224 |
| 120 | WITI | ABC | 21 | Milwaukee | 133 |
| 13 | WTIC | CBS | 22 | Hartford-New Haven | 326 |
| 28 | WTNH | ABC | 22 | Hartford-New Haven | 270 |
| 144 | WHNB | NBC | 22 | Hartford-New Haven | 0 |
| 97 | KMBC | ABC | 23 | Kansas City | 172 |
| 81 | WDAF | NBC | 23 | Kansas City | 185 |
| 109 | KCMO | CBS | 23 | Kansas City | 151 |
| 6 | WTVT | CBS | 24 | Tampa-St. Petersburg | 386 |
| 54 | WFLA | NBC | 24 | Tampa-St. Petersburg | 230 |
| 4 | WLCY | ABC | 24 | Tampa-St. Petersburg | 462 |
| 31 | WKBW | ABC | 25 | Buffalo | 263 |
| 69 | WGR | NBC | 25 | Buffalo | 203 |
| 35 | WBFN | CBS | 25 | Buffalo | 258 |
| 55 | KATU | ABC | 26 | Portland | 230 |
| 32 | KGW | NBC | 26 | Portland | 62 |
| 5 | KOIN | CBS | 26 | Portland | 446 |
| 98 | KOVR | ABC | 27 | Sacramento-Stockton | 172 |
| 74 | KXTV | CBS | 27 | Sacramento-Stockton | 195 |
| 77 | KCRA | NBC | 27 | Sacramento-Stockton | 192 |

### *Network Affiliates Ranked by Number of Public Service Announcements in Composite Week*—Continued

| Rank | Call letters | Net. aff. | Mkt. No. | Location | PSA's |
|---|---|---|---|---|---|
| 76 | WTVN | ABC | 28 | Columbus | 194 |
| 91 | WLWC | NBC | 28 | Columbus | 177 |
| 15 | WBNS | CBS | 28 | Columbus | 317 |
| 134 | WHBQ | ABC | 29 | Memphis | 107 |
| 80 | WMC | NBC | 29 | Memphis | 186 |
| 131 | WREC | CBS | 29 | Memphis | 112 |
| 138 | WSIX | ABC | 30 | Nashville | 84 |
| 139 | WLAC | CBS | 30 | Nashville | 84 |
| 142 | WSM | NBC | 30 | Nashville | 75 |
| 95 | WWL | CBS | 31 | New Orleans | 176 |
| 72 | WVUE | ABC | 31 | New Orleans | 198 |
| 136 | WDSU | NBC | 31 | New Orleans | 98 |
| 51 | KMGH | CBS | 32 | Denver | 234 |
| 123 | KBTV | ABC | 32 | Denver | 129 |
| 61 | KOA | NBC | 32 | Denver | 216 |
| 92 | WSAZ | NBC | 33 | Charleston-Huntington | 177 |
| 70 | WCHS | CBS | 33 | Charleston-Huntington | 203 |
| 59 | WHTN | ABC | 33 | Charleston-Huntington | 221 |
| 33 | WTEV | ABC | 34 | Providence | 259 |
| 7 | WJAR | NBC | 34 | Providence | 369 |
| 105 | WPRI | CBS | 34 | Providence | 159 |
| 110 | WSOC | NBC | 35 | Charlotte | 151 |
| 114 | WCCB | ABC | 35 | Charlotte | 149 |
| 63 | WBIV | CBS | 35 | Charlotte | 212 |
| 66 | WHAS | CBS | 36 | Louisville | 207 |
| 84 | WAVE | NBC | 36 | Louisville | 184 |
| 130 | WLKY | ABC | 36 | Louisville | 112 |
| 52 | WTEN | CBS | 37 | Albany-Schenectady-T | 231 |
| 48 | WAST | ABC | 37 | Albany-Schenectady-T | 238 |
| 26 | WRGB | NBC | 37 | Albany-Schenectady-T | 281 |
| 19 | WAPI | NBC | 38 | Birmingham | 300 |
| 82 | WBRC | ABC | 38 | Birmingham | 185 |
| 119 | WBMG | CBS | 38 | Birmingham | 134 |
| 143 | WHIO | CBS | 39 | Dayton | 60 |
| 79 | WLWD | NBC | 39 | Dayton | 188 |
| 104 | WSPA | CBS | 40 | Gnville-Sptnbg-Ashvi | 162 |
| 86 | WFBC | NBC | 40 | Gnville-Sptnbg-Ashvi | 183 |
| 125 | WLOS | ABC | 40 | Gnville-Sptngb-Ashvi | 126 |
| 24 | WZZM | ABC | 41 | Kalamazoo-Gr Rapids | 286 |
| 129 | WKZO | CBS | 41 | Kalamazoo-Gr Rapids | 141 |
| 75 | WOTV | NBC | 41 | Kalamazoo-Gr Rapids | 195 |
| 8 | KWTV | CBS | 41 | Oklahoma City | 365 |
| 1 | WKY | NBC | 41 | Oklahoma City | 572 |
| 34 | KOCO | ABC | 41 | Oklahoma City | 259 |
| 115 | WHEN | CBS | 43 | Syracuse | 148 |
| 27 | WSYR | NBC | 43 | Syracuse | 272 |
| 73 | WNYS | ABC | 43 | Syracuse | 197 |
| 93 | WVEC | ABC | 44 | Norf-Newp News-Hamp | 177 |
| 20 | WAVY | NBC | 44 | Norf-Newp News-Hamp | 297 |
| 90 | KTAR | NBC | 45 | Phoenix | 179 |
| 111 | KTVK | ABC | 45 | Phoenix | 150 |
| 11 | KOOL | CBS | 45 | Phoenix | 336 |
| 128 | KSAT | ABC | 45 | San Antonio | 115 |
| 39 | WOAI | NBC | 45 | San Antonio | 247 |
| 64 | KENS | CBS | 45 | San Antonio | 211 |
| 117 | WDHO | ABC | 45 | Toledo | 146 |
| 108 | WSPD | NBC | 45 | Toledo | 154 |
| 103 | WTOL | CBS | 45 | Toledo | 163 |
| 112 | WXII | NBC | 48 | Gnsb-High Pt-Win Sal | 149 |
| 94 | WFMY | CBS | 48 | Gnsb-High Pt-Win Sal | 177 |
| 37 | KFMB | CBS | 49 | San Diego | 251 |
| 121 | KGTV | NBC | 49 | San Diego | 132 |
| 29 | KGPX | ABC | 50 | Salt Lake City | 269 |
| 118 | KSL | CBS | 50 | Salt Lake City | 135 |
| 107 | KUTV | NBC | 50 | Salt Lake City | 155 |

### *Network Affiliates Ranked by Number of Composite Week Hours With More Than 12 Min of Commercials*

| Rank | Call letters | Net. aff. | Mkt. No. | Location | 12-16 min | Over 16 | Total |
|---|---|---|---|---|---|---|---|
| 96 | WNBC | NBC | 1 | New York City | 40 | 0 | 40 |
| 54 | WABC | ABC | 1 | New York City | 33 | 0 | 33 |
| 109 | WCBS | CBS | 1 | New York City | 44 | 0 | 44 |
| 138 | KNBC | NBC | 2 | Los Angeles | 52 | 0 | 52 |
| 97 | KABC | ABC | 2 | Los Angeles | 39 | 1 | 40 |
| 125 | KNXT | CBS | 2 | Los Angeles | 48 | 0 | 48 |

**Network Affiliates Ranked by Number of Public Service Announcements in Composite Week—Continued**

| Rank | Call letters | Net. aff. | Mkt. No. | Location | 12-16 min | Over 16 | Total |
|---|---|---|---|---|---|---|---|
| 141 | WBBM | CBS | 3 | Chicago | 56 | 0 | 56 |
| 134 | WMAQ | NBC | 3 | Chicago | 50 | 0 | 50 |
| 143 | WLS | ABC | 3 | Chicago | 55 | 3 | 58 |
| 113 | WPVI | ABC | 4 | Philadelphia | 44 | 1 | 46 |
| 124 | WCAU | CBS | 4 | Philadelphia | 48 | 0 | 48 |
| 23 | KYW | NBC | 4 | Philadelphia | 26 | 0 | 25 |
| 129 | WWJ | NBC | 5 | Detroit | 49 | 0 | 49 |
| 133 | WXYZ | ABC | 5 | Detroit | 50 | 0 | 50 |
| 115 | WJBK | CBS | 5 | Detroit | 45 | 1 | 46 |
| 26 | WNAC | ABC | 6 | Boston | 26 | 1 | 27 |
| 53 | WBZ | NBC | 6 | Boston | 33 | 0 | 33 |
| 98 | WBWS | ABC | 7 | Cleveland | 41 | 0 | 41 |
| 103 | WJW | CBS | 7 | Cleveland | 42 | 0 | 42 |
| 123 | WKYC | NBC | 7 | Cleveland | 48 | 0 | 48 |
| 100 | KGO | ABC | 8 | San Francisco | 40 | 1 | 41 |
| 1 | KPIX | CBS | 8 | San Francisco | 2 | 0 | 2 |
| 10 | WTAE | ABC | 9 | Pittsburgh | 20 | 0 | 20 |
| 30 | KDKA | CBS | 9 | Pittsburgh | 29 | 0 | 29 |
| 105 | WIIC | NBC | 9 | Pittsburgh | 41 | 1 | 42 |
| 44 | WMAL | ABC | 10 | Washington D.C | 32 | 0 | 32 |
| 120 | WTOP | CBS | 10 | Washington D.C | 46 | 1 | 47 |
| 102 | WRC | NBC | 10 | Washington D.C | 42 | 0 | 42 |
| 76 | WFAA | ABC | 11 | Dallas-Fort Worth | 36 | 1 | 37 |
| 122 | KOFW | CBS | 11 | Dallas-Fort Worth | 48 | 0 | 48 |
| 39 | WBAP | NBC | 11 | Dallas-Fort Worth | 30 | 1 | 31 |
| 104 | KMOX | CBS | 12 | St. Louis | 42 | 0 | 42 |
| 75 | KSD | NBC | 12 | St. Louis | 36 | 1 | 37 |
| 25 | KTVI | ABC | 12 | St. Louis | 27 | 0 | 27 |
| 139 | WCCO | CBS | 13 | Minneapolis-St Paul | 51 | 2 | 53 |
| 15 | KMSP | ABC | 13 | Minneapolis-St. Paul | 24 | 0 | 24 |
| 61 | KSTP | NBC | 13 | Minneapolis-St. Paul | 35 | 0 | 35 |
| 130 | WLWI | ABC | 14 | Indianapolis | 48 | 1 | 49 |
| 79 | WISH | CBS | 14 | Indianapolis | 38 | 0 | 38 |
| 38 | WRTV | NBC | 14 | Indianapolis | 31 | 0 | 31 |
| 110 | KHOU | CBS | 15 | Houston | 43 | 1 | 44 |
| 68 | KIRK | ABC | 15 | Houston | 36 |  | 36 |
| 80 | KPRC | NBC | 15 | Houston | 36 | 2 | 38 |
| 108 | KIRO | CBS | 16 | Seattle-Tacoma | 44 | 0 | 44 |
| 60 | KOMO | ABC | 16 | Seattle-Tacoma | 35 | 0 | 35 |
| 6 | KING | NBC | 16 | Seattle-Tacoma | 18 | 0 | 18 |
| 52 | WSB | NBC | 17 | Atlanta | 33 | 0 | 33 |
| 112 | WQXI | ABC | 17 | Atlanta | 45 | 0 | 45 |
| 121 | WAGA | CBS | 17 | Atlanta | 48 | 0 | 48 |
| 34 | WTVJ | CBS | 18 | Miami | 30 | 0 | 30 |
| 48 | WCKT | NBC | 18 | Miami | 31 | 1 | 32 |
| 86 | WPLG | ABC | 18 | Miami | 38 | 1 | 39 |
| 95 | WBAL | NBC | 19 | Baltimore | 40 | 0 | 40 |
| 4 | WJZ | ABC | 19 | Baltimore | 13 | 0 | 13 |
| 78 | WMAR | CBS | 19 | Baltimore | 38 | 0 | 38 |
| 131 | WLWT | NBC | 20 | Cincinnati | 46 | 3 | 49 |
| 33 | WKRC | ABC | 20 | Cincinnati | 30 | 0 | 30 |
| 99 | WCPO | CBS | 20 | Cincinnati | 40 | 1 | 41 |
| 107 | WTMJ | NBC | 21 | Milwaukee | 43 | 0 | 43 |
| 128 | WISN | CBS | 21 | Milwaukee | 46 | 2 | 48 |
| 21 | WITI | ABC | 21 | Milwaukee | 25 | 0 | 25 |
| 5 | WTIC | CBS | 22 | Hartford-New Haven | 15 | 0 | 15 |
| 57 | WINH | ABC | 22 | Hartford-New Haven | 35 | 0 | 35 |
| 64 | WHNB | NBC | 22 | Hartford-New Haven | 36 | 0 | 36 |
| 94 | KMBC | ABC | 23 | Kansas City | 40 | 0 | 40 |
| 144 | WDAF | NBC | 23 | Kansas City | 49 | 10 | 59 |
| 101 | KCMD | CBS | 23 | Kansas City | 42 |  | 42 |
| 118 | WTVT | CBS | 24 | Tampa-St. Petersburg | 47 | 0 | 47 |
| 132 | WFLA | NBC | 24 | Tampa-St. Petersburg | 50 | 0 | 50 |
| 87 | WLCY | ABC | 24 | Tampa-St. Petersburg | 37 | 2 | 39 |
| 20 | WKBW | ABC | 25 | Buffalo | 25 | 0 | 25 |
| 43 | WGR | NBC | 25 | Buffalo | 32 | 0 | 32 |
| 59 | WBEN | CBS | 25 | Buffalo | 35 | 0 | 35 |
| 24 | KATU | ABC | 26 | Portland | 27 | 0 | 27 |
| 51 | KGW | NBC | 26 | Portland | 33 | 0 | 33 |
| 62 | KOIN | CBS | 26 | Portland | 33 | 2 | 35 |
| 19 | KDVR | ABC | 27 | Sacramento-Stockton | 25 | 0 | 25 |
| 127 | KXTV | CBS | 27 | Sacramento-Stockton | 47 | 1 | 48 |
| 77 | KCRA | NBC | 27 | Sacramento-Stockton | 35 | 2 | 37 |
| 69 | WTVN | ABC | 28 | Columbus | 35 | 1 | 36 |
| 126 | WLWC | NBC | 28 | Columbus | 47 | 1 | 48 |
| 85 | WBNS | CBS | 28 | Columbus | 39 | 0 | 39 |
| 50 | WHBQ | ABC | 29 | Memphis | 33 | 0 | 33 |
| 114 | WMC | NBC | 29 | Memphis | 45 | 1 | 46 |
| 58 | WREC | CBS | 29 | Memphis | 35 | 0 | 35 |
| 31 | WSIX | ABC | 30 | Nashville | 28 | 1 | 29 |
| 116 | WLAC | CBS | 30 | Nashville | 44 | 2 | 46 |
| 67 | WSM | NBC | 30 | Nashville | 36 | 0 | 36 |

*Network Affiliates Ranked by Number of Composite Week Hours With More Than 12 Min of Commercials*—Continued

| Rank | Call letters | Net. aff. | Mkt. No. | Location | 12-16 min | Over 16 | Total |
|---|---|---|---|---|---|---|---|
| 72 | WWL | CBS | 31 | New Orleans | 37 | 0 | 37 |
| 47 | WVUE | ABC | 31 | New Orleans | 31 | 1 | 32 |
| 82 | WDSU | NBC | 31 | New Orleans | 39 | 0 | 39 |
| 117 | KMGH | CBS | 32 | Denver | 47 | 0 | 47 |
| 142 | KBTV | ABC | 32 | Denver | 57 | 1 | 58 |
| 111 | KDA | NBC | 32 | Denver | 42 | 2 | 44 |
| 71 | WSAZ | NBC | 33 | Charleston-Huntington | 37 | 0 | 37 |
| 27 | WCHS | CBS | 33 | Charleston-Huntington | 24 | 3 | 27 |
| 18 | WHTN | ABC | 33 | Charleston-Huntington | 25 | 0 | 25 |
| 45 | WTEV | ABC | 34 | Providence | 32 | 0 | 32 |
| 70 | WJAR | NBC | 34 | Providence | 37 | 0 | 37 |
| 3 | WPRI | CBS | 34 | Providence | 10 | 1 | 11 |
| 17 | WSOC | NBC | 35 | Charlotte | 25 | 0 | 25 |
| 84 | WCCB | ABC | 35 | Charlotte | 39 | 0 | 39 |
| 93 | WBTV | CBS | 35 | Charlotte | 40 | 0 | 40 |
| 35 | WHAS | CBS | 36 | Louisville | 29 | 1 | 30 |
| 92 | WAVE | NBC | 36 | Louisville | 40 | 0 | 40 |
| 11 | WLKY | ABC | 36 | Louisville | 21 | 1 | 22 |
| 73 | WTEN | CBS | 37 | Albany-Schenectady-Troy | 37 | 0 | 37 |
| 9 | WAST | ABC | 37 | Albany-Schenectady-Troy | 18 | 1 | 19 |
| 37 | WRGB | NBC | 37 | Albany-Schenectady-Troy | 31 | 0 | 31 |
| 22 | WAPI | NBC | 38 | Birmingham | 24 | 1 | 25 |
| 56 | WBRC | ABC | 38 | Birmingham | 29 | 4 | 33 |
| 55 | WBMG | CBS | 38 | Birmingham | 31 | 2 | 33 |
| 135 | WHIO | CBS | 39 | Dayton | 48 | 2 | 50 |
| 137 | WLWD | NBC | 39 | Dayton | 49 | 2 | 51 |
| 119 | WSPA | CBS | 40 | Gainesville-Spartanburg-Asheville. | 46 | 1 | 47 |
| 14 | WFBC | NBC | 40 | Gainesville-Spartanburg-Asheville. | 24 | 0 | 24 |
| 12 | WLOS | ABC | 40 | Gainesville-Spartenburg-Asheville. | 23 | 0 | 23 |
| 46 | WZZM | ABC | 41 | Kalamazoo-Grand Rapids | 31 | 1 | 32 |
| 91 | WKZO | CBS | 41 | Kalamazoo-Grand Rapids | 40 | 0 | 40 |
| 106 | WOTV | NBC | 41 | Kalamazoo-Grand Rapids | 43 | 0 | 43 |
| 74 | KWTV | CBS | 41 | Oklahoma City | 37 | 0 | 37 |
| 40 | WKY | NBC | 41 | Oklahoma City | 29 | 2 | 31 |
| 81 | KOCO | ABC | 41 | Oklahoma City | 39 | 0 | 39 |
| 90 | WHEN | CBS | 43 | Syracuse | 40 | 0 | 40 |
| 13 | WSYR | NBC | 43 | Syracuse | 24 | 0 | 24 |
| 8 | WNYS | ABC | 43 | Syracuse | 19 | 0 | 19 |
| 42 | WVEC | ABC | 44 | Norf-Newp News-Hamp | 32 | 0 | 32 |
| 36 | WAVY | NBC | 44 | Norf-Newp News-Hamp | 31 | 0 | 31 |
| 66 | KTAR | NBC | 45 | Phoenix | 36 | 0 | 36 |
| 49 | KTVK | ABC | 45 | Phoenix | 33 | 0 | 33 |
| 140 | KOOL | CBS | 45 | Phoenix | 55 | 0 | 55 |
| 28 | KSAT | ABC | 45 | San Antonio | 28 | 0 | 28 |
| 32 | WOAI | NBC | 45 | San Antonio | 27 | 2 | 29 |
| 83 | KENS | CBS | 45 | San Antonio | 39 | 0 | 39 |
| 7 | WDHO | ABC | 45 | Toledo | 18 | 0 | 18 |
| 41 | WSPD | NBC | 45 | Toledo | 32 | 0 | 32 |
| 65 | WTOL | CBS | 45 | Toledo | 36 | 0 | 36 |
| 29 | WXII | NBC | 48 | Gnsb-High Pt-Win-Sal | 28 | 0 | 28 |
| 2 | WFMY | CBS | 48 | Gnsb-High Pt-Win-Sal | 4 | 0 | 4 |
| 136 | KFMB | CBS | 49 | San Diego | 47 | 3 | 50 |
| 89 | KGTV | NBC | 49 | San Diego | 40 | 0 | 40 |
| 16 | KCPX | ABC | 50 | Salt Lake City | 25 | 0 | 25 |
| 88 | KSL | CBS | 50 | Salt Lake City | 40 | 0 | 40 |
| 63 | KUTV | NBC | 50 | Salt Lake City | 36 | 0 | 36 |

## *Network Affiliates Ranked by Local Programming*

| Rank | Call letters | Net. aff. | Mkt. No. | Location | Prime time local and rank | | Local programming and rank | | Composite |
|---|---|---|---|---|---|---|---|---|---|
| 60 | WNBC | NBC | 1 | New York City | 6.00 | 46 | 13.67 | 66 | 9.833 |
| 63 | WABC | ABC | 1 | New York City | 5.38 | 64 | 13.62 | 67 | 9.500 |
| 75 | WCBS | CBS | 1 | New York City | 6.50 | 29 | 11.00 | 88 | 8.750 |
| 3 | KNBC | NBC | 2 | Los Angeles | 8.00 | 7 | 21.92 | 4 | 14.958 |
| 123 | KABC | ABC | 2 | Los Anglees | 1.00 | 130 | 10.17 | 100 | 5.583 |
| 21 | KNXT | CBS | 2 | Los Angeles | 6.50 | 30 | 18.55 | 17 | 12.525 |
| 33 | WBBM | CBS | 3 | Chicago | 7.73 | 11 | 15.23 | 53 | 11.483 |
| 41 | WMAO | NBC | 3 | Chicago | 4.15 | 78 | 17.57 | 29 | 10.858 |
| 53 | WLS | ABC | 3 | Chicago | 7.03 | 19 | 13.10 | 74 | 10.067 |
| 14 | WPVI | ABC | 4 | Philadelphia | 4.00 | 80 | 21.92 | 5 | 12.958 |
| 42 | WCAU | CBS | 4 | Philadelphia | 6.00 | 47 | 15.58 | 44 | 10.792 |
| 2 | KYW | NBC | 4 | Philadelphia | 6.00 | 48 | 25.42 | 2 | 15.708 |
| 9 | WWJ | NBC | 5 | Detroit | 6.52 | 27 | 20.30 | 6 | 13.408 |
| 89 | WXYZ | ABC | 5 | Detroit | 5.50 | 57 | 10.00 | 106 | 7.750 |
| 93 | WJBK | CBS | 5 | Detroit | 4.00 | 81 | 10.83 | 89 | 7.417 |
| 37 | WNAC | ABC | 6 | Boston | 5.00 | 70 | 17.58 | 27 | 11.292 |
| 15 | WBZ | NBC | 6 | Boston | 6.50 | 31 | 19.35 | 12 | 12.925 |
| 92 | WEWS | ABC | 7 | Cleveland | 0.50 | 135 | 14.65 | 60 | 7.575 |
| 69 | WJW | CBS | 7 | Cleveland | 2.95 | 117 | 15.28 | 52 | 9.117 |
| 113 | WKYC | NBC | 7 | Cleveland | 3.55 | 90 | 9.12 | 114 | 6.333 |
| 94 | KGO | ABC | 8 | San Francisco | 3.58 | 89 | 11.08 | 87 | 7.333 |
| 31 | KPIX | CBS | 8 | San Francisco | 7.00 | 21 | 16.00 | 40 | 11.500 |
| 52 | WTAE | ABC | 9 | Pittsburgh | 3.42 | 101 | 16.78 | 34 | 10.100 |
| 4 | KDKA | CBS | 9 | Pittsburgh | 8.82 | 5 | 19.88 | 8 | 14.350 |
| 17 | WIIC | NBC | 9 | Pittsburgh | 6.50 | 36 | 18.83 | 16 | 12.667 |
| 28 | WMAL | ABC | 10 | Washington, D.C | 3.50 | 91 | 20.07 | 7 | 11,783 |
| 79 | WTOP | CBS | 10 | Washington, D.C | 6.28 | 37 | 11.10 | 86 | 8.692 |
| 49 | WRC | NBC | 10 | Washington, D.C | 6.00 | 40 | 14.92 | 58 | 10.458 |
| 47 | WFAA | ABC | 11 | Dallas-Fort Worth | 9.00 | 2 | 12.00 | 79 | 10.500 |
| 26 | KDFW | CBS | 11 | Dallas-Fort Worth | 7.67 | 12 | 16.17 | 39 | 11.917 |
| 132 | WBAP | NBC | 11 | Dallas-Fort Worth | 1.17 | 129 | 9.17 | 113 | 5.167 |
| 59 | KMOX | CBS | 12 | St. Louis | 6.27 | 38 | 13.48 | 68 | 9.875 |
| 36 | KSD | NBC | 12 | St. Louis | 6.50 | 32 | 16.33 | 37 | 11.417 |
| 86 | KTVI | ABC | 12 | St. Louis | 2.50 | 122 | 13.25 | 72 | 7.875 |
| 12 | WCCO | CBS | 13 | Minneapolis-St. Paul | 8.92 | 4 | 17.25 | 32 | 13.083 |
| 109 | KMSP | ABC | 13 | Minneapolis-St. Paul | 3.08 | 106 | 9.95 | 107 | 6.517 |
| 43 | KSIP | NBC | 13 | Minneapolis-St. Paul | 6.52 | 28 | 15.00 | 55 | 10.758 |
| 64 | WLWI | ABC | 14 | Indianapolis | 5.17 | 68 | 13.75 | 65 | 9.458 |
| 73 | WISH | CBS | 14 | Indianapolis | 6.00 | 50 | 11.82 | 81 | 8.908 |
| 65 | WRTV | NBC | 14 | Indianapolis | 5.50 | 56 | 13.42 | 71 | 9.458 |
| 25 | KHOU | CBS | 15 | Houston | 6.03 | 44 | 18.25 | 19 | 12.142 |
| 18 | KTRK | ABC | 15 | Houston | 7.38 | 18 | 17.90 | 22 | 12.642 |

### *Network Affiliates Ranked by Local Programming*—Continued

| Rank | Call letters | Net. aff. | Mkt. No. | Location | Prime time local and rank | | Local programming and rank | | Composite |
|---|---|---|---|---|---|---|---|---|---|
| 29 | KPRC | NBC | 15 | Houston | 7.52 | 14 | 15.93 | 42 | 11.725 |
| 66 | KIRO | CBS | 16 | Seattle-Tacoma | 3.83 | 85 | 14.92 | 59 | 9.375 |
| 32 | KOMO | ABC | 16 | Seattle-Tacoma | 6.00 | 51 | 16.98 | 33 | 11.492 |
| 76 | KING | NBC | 16 | Seattle-Tacoma | 3.45 | 100 | 14.05 | 61 | 8.750 |
| 5 | WSB | NBC | 17 | Atlanta | 9.00 | 3 | 19.42 | 11 | 14.208 |
| 129 | WQXI | ABC | 17 | Atlanta | 0.0 | 140 | 10.55 | 94 | 5.275 |
| 70 | WAGA | CBS | 17 | Atlanta | 6.56 | 26 | 11.67 | 83 | 9.108 |
| 105 | WTVJ | CBS | 18 | Miami | 4.02 | 79 | 9.38 | 112 | 6.700 |
| 71 | WCKT | NBC | 18 | Miami | 5.50 | 59 | 12.42 | 77 | 8.958 |
| 10 | WPLG | ABC | 18 | Miami | 4.53 | 76 | 22.02 | 3 | 13.275 |
| 19 | WBAL | NBC | 19 | Baltimore | 7.80 | 10 | 17.30 | 31 | 12.550 |
| 6 | WJZ | ABC | 19 | Baltimore | 8.53 | 6 | 19.45 | 10 | 13.992 |
| 11 | WMAR | CBS | 19 | Baltimore | 7.42 | 16 | 19.03 | 14 | 13.225 |
| 1 | WLWT | NBC | 20 | Cincinnati | 6.17 | 42 | 35.67 | 1 | 20.917 |
| 74 | WKRC | ABC | 20 | Cincinnati | 2.77 | 119 | 14.95 | 57 | 8.858 |
| 40 | WCPO | CBS | 20 | Cincinnati | 4.00 | 82 | 17.75 | 25 | 10.875 |
| 13 | WTMJ | NBC | 21 | Milwaukee | 8.00 | 8 | 17.95 | 20 | 12.975 |
| 97 | WISN | CBS | 21 | Milwaukee | 4.77 | 74 | 9.55 | 108 | 7.158 |
| 72 | WITI | ABC | 21 | Milwaukee | 6.50 | 33 | 11.42 | 84 | 8.958 |
| 68 | WTIC | CBS | 22 | Hartford-New Haven | 5.10 | 69 | 13.20 | 73 | 9.150 |
| 81 | WTNH | ABC | 22 | Hartford-New Haven | 3.03 | 107 | 13.48 | 69 | 8.258 |
| 116 | WHNB | NBC | 22 | Hartford-New Haven | 3.33 | 102 | 8.77 | 119 | 6.050 |
| 102 | KMBC | ABC | 23 | Kansas City | 6.00 | 52 | 7.58 | 136 | 6.792 |
| 34 | WDAF | NBC | 23 | Kansas City | 6.50 | 34 | 16.45 | 36 | 11.475 |
| 54 | KCMO | CBS | 23 | Kansas City | 7.58 | 13 | 12.50 | 76 | 10.042 |
| 80 | WTVT | CBS | 24 | Tampa-St. Petersburg | 6.25 | 40 | 10.80 | 90 | 8.525 |
| 120 | WFLA | NBC | 24 | Tampa-St. Petersburg | 3.00 | 110 | 8.42 | 123 | 5.708 |
| 61 | WLCY | ABC | 24 | Tampa-St. Petersburg | 1.83 | 127 | 17.83 | 23 | 9.833 |
| 78 | WKBW | ABC | 25 | Buffalo | 3.50 | 92 | 13.92 | 62 | 8.708 |
| 141 | WGR | NBC | 25 | Buffalo | 2.50 | 123 | 4.50 | 143 | 3.500 |
| 55 | WBEN | CBS | 25 | Buffalo | 3.50 | 93 | 16.58 | 35 | 10.042 |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| 50 | KATU | ABC | 26 | Portland | 4.97 | 73 | 15.95 | 41 | 10.458 |
| 67 | KGW | NBC | 26 | Portland | 3.00 | 111 | 15.42 | 49 | 9.208 |
| 84 | KOIN | CBS | 26 | Portland | 3.90 | 84 | 12.13 | 78 | 8.017 |
| 134 | KOVR | ABC | 27 | Sacramento-Stockton | 2.67 | 120 | 6.17 | 141 | 4.417 |
| 101 | KXTV | CBS | 27 | Sacramento-Stockton | 5.50 | 60 | 8.33 | 124 | 6.917 |
| 27 | KCRA | NBC | 27 | Sacramento-Stockton | 7.40 | 17 | 16.27 | 38 | 11.833 |
| 128 | WTVN | ABC | 28 | Columbus | 0.0 | 141 | 10.75 | 91 | 5.375 |
| 99 | WLWC | NBC | 28 | Columbus | 3.25 | 104 | 10.67 | 93 | 6.958 |
| 22 | WBNS | CBS | 28 | Columbus | 6.67 | 25 | 18.33 | 18 | 12.500 |
| 138 | WHBQ | ABC | 29 | Memphis | 0.0 | 142 | 7.92 | 129 | 3.958 |
| 38 | WMC | NBC | 29 | Memphis | 7.00 | 22 | 15.47 | 48 | 11.233 |
| 131 | WREC | CBS | 29 | Memphis | 2.67 | 121 | 7.75 | 133 | 5.208 |
| 82 | WSIX | ABC | 30 | Nashville | 4.52 | 77 | 11.82 | 82 | 8.167 |
| 39 | WLAC | CBS | 30 | Nashville | 6.92 | 23 | 15.00 | 56 | 10.958 |
| 24 | WSM | NBC | 30 | Nashville | 7.02 | 20 | 17.60 | 26 | 12.308 |
| 7 | WWL | CBS | 31 | New Orleans | 9.58 | 1 | 17.92 | 21 | 13.750 |
| 107 | WVUE | ABC | 31 | New Orleans | 5.23 | 65 | 7.93 | 128 | 6.583 |
| 20 | WDSU | NBC | 31 | New Orleans | 7.50 | 15 | 17.58 | 28 | 12.542 |
| 44 | KMGH | CBS | 32 | Denver | 6.27 | 39 | 15.07 | 54 | 10.667 |
| 91 | KBTV | ABC | 32 | Denver | 5.22 | 67 | 10.17 | 101 | 7.692 |
| 56 | KOA | NBC | 32 | Denver | 4.67 | 75 | 15.42 | 50 | 10.042 |
| 119 | WSAZ | NBC | 33 | Charleston-Huntington | 3.83 | 86 | 7.67 | 135 | 5.750 |
| 85 | WCHS | CBS | 33 | Charleston-Huntington | 2.50 | 124 | 13.47 | 70 | 7.983 |
| 140 | WHTN | ABC | 33 | Charleston-Huntington | 0.50 | 136 | 7.00 | 139 | 3.750 |
| 130 | MTEV | ABC | 34 | Providence | 0.50 | 134 | 10.00 | 105 | 5.250 |
| 114 | WJAR | NBC | 34 | Providence | 3.50 | 94 | 8.83 | 117 | 6.167 |
| 115 | WPRI | CBS | 34 | Providence | 3.50 | 95 | 8.67 | 121 | 6.083 |
| 122 | WSOC | NBC | 35 | Charlotte | 3.00 | 112 | 8.33 | 125 | 5.667 |
| 133 | WCCB | ABC | 35 | Charlotte | 0.83 | 131 | 8.33 | 126 | 4.583 |
| 46 | WBTV | CBS | 35 | Charlotte | 5.70 | 55 | 15.53 | 46 | 10.617 |
| 35 | WHAS | CBS | 36 | Louisville | 5.57 | 56 | 17.35 | 30 | 11.458 |
| 95 | WAVE | NBC | 36 | Louisville | 3.00 | 113 | 11.42 | 85 | 7.208 |
| 136 | WLKY | ABC | 36 | Louisville | 0.0 | 143 | 8.75 | 120 | 4.375 |
| 110 | WTEN | CBS | 37 | Albany-Schenectady-T | 3.00 | 109 | 10.00 | 104 | 6.500 |
| 135 | WAST | ABC | 37 | Albany-Schenectady-T | 1.48 | 128 | 7.33 | 138 | 4.408 |
| 100 | WRGB | NBC | 37 | Albany-Schenectady-T | 3.50 | 96 | 10.42 | 95 | 6.958 |

## *Network Affiliates Ranked by Local Programming*—Continued

| Rank | Call letters | Net. aff. | Mkt. No. | Location | Prime time local and rank | | Local programming and rank | | Composite |
|---|---|---|---|---|---|---|---|---|---|
| 126 | WAPI | NBC | 38 | Birmingham | 2.50 | 125 | 8.50 | 122 | 5.500 |
| 23 | WBRC | ABC | 38 | Birmingham | 5.23 | 66 | 19.62 | 9 | 12.425 |
| 125 | WBMG | CBS | 38 | Birmingham | 3.20 | 105 | 7.83 | 131 | 5.517 |
| 45 | WHIO | CBS | 39 | Dayton | 6.00 | 53 | 15.30 | 51 | 10.650 |
| 30 | WLWD | NBC | 39 | Dayton | 5.50 | 61 | 17.83 | 24 | 11.667 |
| 103 | WSPA | CBS | 40 | Gnville-Sptnbg-Ashvi | 3.30 | 103 | 10.25 | 98 | 6.775 |
| 104 | WFBC | NBC | 40 | Gnville-Sptnbg-Ashvi | 3.00 | 114 | 10.42 | 96 | 6.708 |
| 143 | WLOS | ABC | 40 | Gnville-Sptnbg-Ashvi | 0.0 | 144 | 6.53 | 140 | 3.267 |
| 112 | WZZM | ABC | 41 | Kalamazoo-Gr Rapids | 0.75 | 133 | 12.00 | 80 | 6.375 |
| 108 | WKZO | CBS | 41 | Kalamazoo-Gr Rapids | 3.00 | 115 | 10.08 | 103 | 6.542 |
| 48 | WOTV | NBC | 41 | Kalamazoo-Gr Rapids | 5.00 | 71 | 15.93 | 43 | 10.467 |
| 77 | KWTV | CBS | 41 | Oklahoma City | 6.75 | 24 | 10.72 | 92 | 8.733 |
| 16 | WKY | NBC | 41 | Oklahoma City | 6.20 | 41 | 19.32 | 18 | 12.758 |
| 62 | KOCO | ABC | 41 | Oklahoma City | 3.75 | 87 | 15.57 | 45 | 9.658 |
| 127 | WHEN | CBS | 43 | Syracuse | 3.50 | 97 | 7.40 | 137 | 5.450 |
| 117 | WSYR | NBC | 43 | Syracuse | 2.50 | 126 | 9.50 | 110 | 6.000 |
| 144 | WNYS | ABC | 43 | Syracuse | 0.50 | 137 | 2.92 | 144 | 1.708 |
| 137 | WVEC | ABC | 44 | Nor-Newp News-Hamp | 0.20 | 138 | 7.73 | 134 | 3.967 |
| 121 | WAVY | NBC | 44 | Nor-Newp News-Hamp | 3.50 | 98 | 7.92 | 130 | 5.708 |
| 8 | KTAR | NBC | 45 | Phoenix | 8.00 | 9 | 18.92 | 15 | 13.458 |
| 88 | KTVK | ABC | 45 | Phoenix | 2.80 | 118 | 12.80 | 75 | 7.800 |
| 98 | KOOL | CBS | 45 | Phoenix | 5.50 | 63 | 8.82 | 118 | 7.158 |
| 90 | KSAT | ABC | 45 | San Antonio | 6.50 | 35 | 9.00 | 115 | 7.750 |
| 58 | WOAI | NBC | 45 | San Antonio | 6.00 | 54 | 13.92 | 63 | 9.958 |
| 106 | KENS | CBS | 45 | San Antonio | 3.68 | 88 | 9.53 | 100 | 6.605 |
| 139 | WDHO | ABC | 45 | Toledo | 0.0 | 139 | 7.82 | 132 | 3.908 |
| 124 | WSPD | NBC | 45 | Toledo | 3.00 | 116 | 8.17 | 127 | 5.583 |
| 87 | WTOL | CBS | 45 | Toledo | 5.50 | 62 | 10.18 | 99 | 7.842 |
| 118 | WXII | NBC | 48 | Gnsb-High Pt-Win-Sal | 3.00 | 108 | 8.92 | 116 | 5.958 |
| 96 | WFMY | CBS | 48 | Gnsb-High Pt-Win-Sal | 4.00 | 83 | 10.42 | 97 | 7.208 |
| 51 | KFMB | CBS | 49 | San Diego | 5.00 | 72 | 15.50 | 47 | 10.250 |
| 111 | KGTV | NBC | 49 | San Diego | 3.50 | 99 | 9.42 | 111 | 6.456 |
| 142 | KCPX | ABC | 50 | Salt Lake City | 0.83 | 132 | 6.10 | 142 | 3.467 |
| 57 | KSL | CBS | 50 | Salt Lake City | 6.13 | 43 | 13.88 | 64 | 10.008 |
| 83 | KUTV | NBC | 50 | Salt Lake City | 6.02 | 45 | 10.17 | 102 | 8.092 |

*Network affiliates ranked by the ratio of program expenses/gross revenues*

| Rank | Call letters | Net. aff. | Mkt. No. | Location |
|---|---|---|---|---|
| 58 | WNBC | NBC | 1 | New York City |
| 1 | WABC | ABC | 1 | New York City |
| 27 | WCBS | CBS | 1 | New York City |
| 35 | KNBC | NBC | 2 | Los Angeles |
| 17 | KABC | ABC | 2 | Los Angeles |
| 88 | KNXT | CBS | 2 | Los Angeles |
| 65 | WBBM | CBS | 3 | Chicago |
| 74 | WMAQ | NBC | 3 | Chicago |
| 68 | WLS | ABC | 3 | Chicago |
| 45 | WPVI | ABC | 4 | Philadelphia |
| 73 | WCAU | CBS | 4 | Philadelphia |
| 123 | KYW | NBC | 4 | Philadelphia |
| 112 | WWJ | NBC | 5 | Detroit |
| 26 | WXYZ | ABC | 5 | Detroit |
| 106 | WJBK | CBS | 5 | Detroit |
| 59 | WNAC | ABC | 6 | Boston |
| 138 | WBZ | NBC | 6 | Boston |
| 56 | WEWS | ABC | 7 | Cleveland |
| 77 | WJW | CBS | 7 | Cleveland |
| 43 | WKYC | NBC | 7 | Cleveland |
| 30 | KGO | ABC | 8 | San Francisco |
| 103 | KPIX | CBS | 8 | San Francisco |
| 15 | WTAE | ABC | 9 | Pittsburgh |
| 57 | KDKA | CBS | 9 | Pittsburgh |
| 8 | WIIC | NBC | 9 | Pittsburgh |
| 9 | WMAL | ABC | 10 | Washington, D.C. |
| 50 | WTOP | CBS | 10 | Washington, D.C. |
| 7 | WRC | NBC | 10 | Washington, D.C. |
| 85 | WFAA | ABC | 11 | Dallas-Fort Worth |
| 141 | KDFW | CBS | 11 | Dallas-Fort Worth |
| 115 | WBAP | NBC | 11 | Dallas-Fort Worth |
| 36 | KMOX | CBS | 12 | St. Louis |
| 108 | KSD | NBC | 12 | St. Louis |
| 19 | KTVI | ABC | 12 | St. Louis |
| 72 | WCCO | CBS | 13 | Minneapolis-St. Paul |
| 126 | KMSP | ABC | 13 | Minneapolis-St. Paul |
| 71 | KSTP | NBC | 13 | Minneapolis-St. Paul |
| 37 | WLWI | ABC | 14 | Indianapolis |
| 135 | WISH | CBS | 14 | Indianapolis |
| 64 | WRTV | NBC | 14 | Indianapolis |
| 127 | KHOU | CBS | 15 | Houston |
| 100 | KTRK | ABC | 15 | Houston |
| 94 | KPRC | NBC | 15 | Houston |
| 125 | KIRO | CBS | 16 | Seattle-Tacoma |
| 28 | KOMO | ABC | 16 | Seattle-Tacoma |
| 3 | KING | NBC | 16 | Seattle-Tacoma |
| 116 | WSB | NBC | 17 | Atlanta |
| 99 | WQXI | ABC | 17 | Atlanta |
| 79 | WAGA | CBS | 17 | Atlanta |
| 46 | WTVJ | CBS | 18 | Miami |
| 117 | WCKT | NBC | 18 | Miami |
| 52 | WPLG | ABC | 18 | Miami |
| 101 | WBAL | NBC | 19 | Baltimore |
| 24 | WJZ | ABC | 19 | Baltimore |
| 104 | WMAR | CBS | 19 | Baltimore |
| 44 | WLWT | NBC | 20 | Cincinnati |
| 133 | WKRC | ABC | 20 | Cincinnati |
| 33 | WCPO | CBS | 20 | Cincinnati |
| 89 | WTMJ | NBC | 21 | Milwaukee |
| 82 | WISN | CBS | 21 | Milwaukee |
| 41 | WITI | ABC | 21 | Milwaukee |
| 110 | WTIC | CBS | 22 | Hartford-New Haven |
| 124 | WTNH | ABC | 22 | Hartford-New Haven |
| 136 | WHNB | NBC | 22 | Hartford-New Haven |
| 90 | KMBC | ABC | 23 | Kansas City |
| 131 | WDAF | NBC | 23 | Kansas City |
| 97 | KCMO | CBS | 23 | Kansas City |
| 51 | WTVT | CBS | 24 | Tampa-St. Petersburg |
| 78 | WFLA | NBC | 24 | Tampa-St. Petersburg |
| 96 | WLCY | ABC | 24 | Tampa-St. Petersburg |
| 109 | WKBW | ABC | 25 | Buffalo |
| 81 | WGR | NBC | 25 | Buffalo |
| 80 | WBEN | CBS | 25 | Buffalo |
| 13 | KATU | ABC | 26 | Portland |
| 2 | KGW | NBC | 26 | Portland |
| 12 | KOIN | CBS | 26 | Portland |
| 5 | KOVR | ABC | 27 | Sacramento-Stockton |
| 66 | KXTV | CBS | 27 | Sacramento-Stockton |
| 69 | KCRA | NBC | 27 | Sacramento-Stockton |
| 105 | WTVN | ABC | 28 | Columbus |

*Network affiliates ranked by the ratio of program expenses/gross revenues*—Con.

| Rank | Call letters | Net. aff. | Mkt. No. | Location |
|---|---|---|---|---|
| 118 | WLWC | NBC | 28 | Columbus |
| 61 | WBNS | CBS | 28 | Columbus |
| 111 | WHBQ | ABC | 29 | Memphis |
| 92 | WMC | NBC | 29 | Memphis |
| 114 | WREC | CBS | 29 | Memphis |
| 22 | WSIX | ABC | 30 | Nashville |
| 49 | WLAC | CBS | 30 | Nashville |
| 16 | WSM | NBC | 30 | Nashville |
| 31 | WWL | CBS | 31 | New Orleans |
| 34 | WVUE | ABC | 31 | New Orleans |
| 55 | WDSU | NBC | 31 | New Orleans |
| 98 | KMGH | CBS | 32 | Denver |
| 42 | KBTV | ABC | 32 | Denver |
| 132 | KOA | NBC | 32 | Denver |
| 139 | WSAZ | NBC | 33 | Charleston-Huntington |
| 140 | WCHS | CBS | 33 | Charleston-Huntington |
| 102 | WHTN | ABC | 33 | Charleston-Huntington |
| 32 | WTEV | ABC | 34 | Providence |
| 91 | WJAR | NBC | 34 | Providence |
| 113 | WPRI | CBS | 34 | Providence |
| 47 | WSOC | NBC | 35 | Charlotte |
| 137 | WCCB | ABC | 35 | Charlotte |
| 20 | WBTV | CBS | 35 | Charlotte |
| 20 | WHAS | CBS | 36 | Louisville |
| 86 | WAVE | NBC | 36 | Louisville |
| 23 | WLKY | ABC | 36 | Louisville |
| 39 | WTEN | CBS | 37 | Albany-Schenectady-T |
| 4 | WAST | ABC | 37 | Albany-Schenectady-T |
| 129 | WRGB | NBC | 37 | Albany-Schenectady-T |
| 63 | WAPI | NBC | 38 | Birmingham |
| 144 | WBRC | ABC | 38 | Birmingham |
| 143 | WBMG | CBS | 38 | Birmingham |
| 87 | WHIO | CBS | 39 | Dayton |
| 83 | WLWD | NBC | 39 | Dayton |
| 121 | WSPA | CBS | 40 | Gainesville-Spartansburg-Asheville |
| 130 | WFBC | NBC | 40 | Gainesville-Spartansburg-Asheville |
| 60 | WLOS | ABC | 40 | Gainesville-Spartansburg-Asheville |
| 14 | WZZM | ABC | 41 | Kalamazoo-Gr Rapids |
| 142 | WKZO | CBS | 41 | Kalamazoo-Gr Rapids |
| 67 | WGTV | NBC | 41 | Kalamazoo-Gr Rapids |
| 25 | KWTV | CBS | 41 | Oklahoma City |
| 70 | WKY | NBC | 41 | Oklahoma City |
| 53 | KOCO | ABC | 41 | Oklahoma City |
| 54 | WHEN | CBS | 43 | Syracuse |
| 10 | WSYR | NBC | 43 | Syracuse |
| 18 | WNYS | ABC | 43 | Syracuse |
| 95 | WVEC | ABC | 44 | Norf-Newp News-Hamp |
| 84 | WAVY | NBC | 44 | Norf-Newp News-Hamp |
| 48 | KTAR | NBC | 45 | Phoenix |
| 75 | KTVK | ABC | 45 | Phoenix |
| 119 | KOOL | CBS | 45 | Phoenix |
| 38 | KSAT | ABC | 45 | San Antonio |
| 93 | WOAI | NBC | 45 | San Antonio |
| 134 | KENS | CBS | 45 | San Antonio |
| 29 | WDHO | ABC | 45 | Toledo |
| 107 | WSPD | NBC | 45 | Toledo |
| 122 | WTOL | CBS | 45 | Toledo |
| 21 | WXII | NBC | 48 | Gnsb-High Pt-Win Sal |
| 76 | WFMY | CBS | 48 | Gnsb-High Pt-Win Sal |
| 128 | KFMB | CBS | 49 | San Diego |
| 62 | KGTV | NBC | 49 | San Diego |
| 40 | KCPX | ABC | 50 | Salt Lake City |
| 6 | KSL | CBS | 50 | Salt Lake City |
| 11 | KUTV | NBC | 50 | Salt Lake City |

### *Network Affiliates Ranked by Percent Minorities Employed*

| Rank | Call letters | Net. aff. | Mkt. No. | Location | SMSA | Total employes | Minorities employed |  | Factor |
|---|---|---|---|---|---|---|---|---|---|
|  |  |  |  |  |  |  | Number | Percent |  |
| 1 | KABC | ABC | 2 | Los Angeles | 32.9% | 192 | 55 | 28.65% | 0.871 |
| 2 | KENS | CBS | 45 | San Antonio | 52.6% | 70 | 17 | 24.29% | 0.462 |
| 3 | KGO | ABC | 8 | San Francisco | 28.9% | 224 | 52 | 23.21% | 0.803 |
| 4 | WRC | NBC | 10 | Washington D.C | 28.3% | 227 | 51 | 22.47% | 0.794 |
| 5 | KNBC | NBC | 2 | Los Angeles | 32.9% | 229 | 50 | 21.83% | 0.664 |
| 6 | KSAT | ABC | 45 | San Antonio | 52.6% | 80 | 17 | 21.25% | 0.404 |
| 7 | WOAI | NBC | 45 | San Antonio | 52.6% | 90 | 19 | 21.11% | 0.401 |
| 8 | KPIX | CBS | 8 | San Francisco | 28.9% | 165 | 31 | 18.79% | 0.650 |
| 9 | WNBC | NBC | 1 | New York City | 30.0% | 237 | 44 | 18.57% | 0.619 |
| 10 | KWTV | CBS | 41 | Oklahoma City | 12.6% | 88 | 16 | 18.18% | 1.443 |
| 11 | WCBS | CBS | 1 | New York City | 30.0% | 280 | 50 | 17.86% | 0.595 |
| 12 | WTOP | CBS | 10 | Washington D.C | 28.3% | 136 | 24 | 17.65% | 0.664 |
| 13 | WKYC | NBC | 7 | Cleveland | 17.6% | 193 | 34 | 17.62% | 1.001 |
| 14 | WLWC | NBC | 28 | Columbus | 12.6% | 93 | 16 | 17.20% | 1.365 |
| 15 | WREC | CBS | 29 | Memphis | 38.4% | 71 | 12 | 16.90% | 0.440 |
| 16 | KOCO | ABC | 41 | Oklahoma City | 12.6% | 77 | 13 | 16.88% | 1.340 |
| 17 | WTVN | ABC | 28 | Columbus | 12.6% | 90 | 15 | 16.67% | 1.323 |
| 18 | WHBQ | ABC | 29 | Memphis | 38.4% | 78 | 13 | 16.67% | 0.434 |
| 19 | WJBK | CBS | 5 | Detroit | 19.9% | 190 | 31 | 16.32% | 0.820 |
| 20 | WTVJ | CBS | 18 | Miami | 39.1% | 155 | 25 | 16.13% | 0.413 |
| 21 | WBAL | NBC | 19 | Baltimore | 25.1% | 149 | 24 | 16.11% | 0.642 |
| 22 | WMAQ | NBC | 3 | Chicago | 23.4% | 342 | 54 | 15.79% | 0.675 |
| 23 | WCKT | NBC | 18 | Miami | 39.1% | 134 | 21 | 15.67% | 0.401 |
| 24 | KMOX | CBS | 12 | St. Louis | 17.3% | 148 | 23 | 15.54% | 0.898 |
| 25 | WPLG | ABC | 18 | Miami | 39.1% | 137 | 21 | 15.33% | 0.392 |
| 26 | KTAR | NBC | 45 | Phoenix | 20.0% | 113 | 17 | 15.04% | 0.752 |
| 27 | WMAL | ABC | 10 | Washington D.C | 28.3% | 140 | 21 | 15.00% | 0.530 |
| 28 | WLS | ABC | 3 | Chicago | 23.4% | 274 | 41 | 14.96% | 0.639 |
| 29 | KIRK | ABC | 15 | Houston | 30.8% | 101 | 15 | 14.85% | 0.482 |
| 30 | WABC | ABC | 1 | New York City | 30.0% | 189 | 28 | 14.81% | 0.494 |
| 31 | WDSU | NBC | 31 | New Orleans | 35.6% | 136 | 20 | 14.71% | 0.413 |
| 32 | WVUE | ABC | 31 | New Orleans | 35.6% | 90 | 13 | 14.44% | 0.406 |
| 33 | WAGA | CBS | 17 | Atlanta | 23.6% | 141 | 20 | 14.18% | 0.601 |
| 34 | WAVY | NBC | 44 | Norf-Newp News-Hamp | 27.3% | 71 | 10 | 14.08% | 0.516 |
| 35 | WQXI | ABC | 17 | Atlanta | 23.6% | 114 | 16 | 14.04% | 0.595 |
| 36 | KING | NBC | 16 | Seattle-Tacoma | 8.0% | 136 | 19 | 13.97% | 1.746 |
| 37 | KNXT | CBS | 2 | Los Angeles | 32.9% | 317 | 44 | 13.88% | 0.422 |
| 38 | KHOU | CBS | 15 | Houston | 30.8% | 94 | 13 | 13.83% | 0.449 |
| 39 | WFLA | NBC | 24 | Tampa-St. Petersburg | 16.8% | 124 | 17 | 13.71% | 0.816 |
| 40 | WBZ | NBC | 6 | Boston | 6.8% | 175 | 23 | 13.14% | 1.933 |

*Network Affiliates Ranked by Percent Minorities Employed*—Continued

| Rank | Call letters | Net. aff. | Mkt. No. | Location | SMSA | Total employes | Minorities employed Number | percent | Factor |
|---|---|---|---|---|---|---|---|---|---|
| 41 | WHIO | CBS | 39 | Dayton | 11.9% | 122 | 16 | 13.11% | 1.102 |
| 42 | WPVI | ABC | 4 | Philadelphia | 19.8% | 153 | 20 | 13.07% | 0.660 |
| 43 | WBBM | CBS | 3 | Chicago | 23.4% | 300 | 39 | 13.00% | 0.556 |
| 44 | WCAU | CBS | 4 | Philadelphia | 19.8% | 70 | 9 | 12.86% | 0.649 |
| 45 | KFMB | CBS | 49 | San Diego | 20.6% | 113 | 14 | 12.39% | 0.601 |
| 46 | KOOL | CBS | 45 | Phoenix | 20.0% | 105 | 13 | 12.38% | 0.619 |
| 47 | WSOC | NBC | 35 | Charlotte | 23.9% | 114 | 14 | 12.28% | 0.514 |
| 48 | WTAR | CBS | 44 | Norf-Newp News-Hamp | 27.3% | 106 | 13 | 12.26% | 0.449 |
| 49 | KCTV | NBC | 49 | San Diego | 20.6% | 132 | 16 | 12.12% | 0.588 |
| 50 | WBMG | CBS | 38 | Birmingham | 30.0% | 33 | 4 | 12.12% | 0.404 |
| 51 | KRON | NBC | 8 | San Francisco | 28.9% | 207 | 25 | 12.08% | 0.418 |
| 52 | WBRC | ABC | 38 | Birmingham | 30.0% | 83 | 10 | 12.05% | 0.402 |
| 53 | KDFW | CBS | 11 | Dallas-Fort Worth | 21.3% | 134 | 16 | 11.94% | 0.561 |
| 54 | KYW | NBC | 4 | Philadelphia | 19.8% | 202 | 24 | 11.88% | 0.600 |
| 55 | WJW | CBS | 7 | Cleveland | 17.6% | 152 | 18 | 11.84% | 0.673 |
| 56 | KCRA | NBC | 27 | Sacramento-Stockton | 22.0% | 128 | 15 | 11.72% | 0.533 |
| 57 | WSIX | ABC | 30 | Nashville | 18.7% | 70 | 8 | 11.43% | 0.611 |
| 58 | WSB | NBC | 17 | Atlanta | 23.6% | 149 | 17 | 11.41% | 0.483 |
| 59 | KDKA | CBS | 9 | Pittsburgh | 7.8% | 167 | 19 | 11.38% | 1.459 |
| 60 | WFMY | CBS | 48 | Greensboro-High Point-Winston-Salem | 20.3% | 89 | 10 | 11.24% | 0.553 |
| 61 | KPRC | NBC | 15 | Houston | 30.8% | 125 | 14 | 11.20% | 0.364 |
| 62 | WBNS | CBS | 28 | Columbus | 12.6% | 127 | 14 | 11.02% | 0.875 |
| 63 | WMC | NBC | 29 | Memphis | 38.4% | 82 | 9 | 10.98% | 0.286 |
| 64 | WMAR | CBS | 19 | Baltimore | 25.1% | 147 | 16 | 10.88% | 0.434 |
| 65 | WFAA | ABC | 11 | Dallas-Fort Worth | 21.3% | 186 | 20 | 10.75% | 0.505 |
| 66 | WKRC | ABC | 20 | Cincinnati | 11.8% | 84 | 9 | 10.71% | 0.908 |
| 67 | WBAP | NBC | 11 | Dallas-Fort Worth | 21.3% | 141 | 15 | 10.64% | 0.499 |
| 68 | WGHP | ABC | 48 | Greensboro-High Point-Winston-Salem | 20.3% | 67 | 7 | 10.45% | 0.515 |
| 69 | WNYS | ABC | 43 | Syracuse | 5.0% | 77 | 8 | 10.39% | 2.078 |
| 70 | WKBW | ABC | 25 | Buffalo | 9.9% | 87 | 9 | 10.34% | 1.045 |
| 71 | KTVI | ABC | 12 | St. Louis | 17.3% | 107 | 11 | 10.28% | 0.594 |
| 72 | WLWD | NBC | 39 | Dayton | 11.9% | 107 | 11 | 10.28% | 0.864 |
| 73 | KTVK | ABC | 45 | Phoenix | 20.0% | 78 | 8 | 10.26% | 0.513 |
| 74 | WLWT | NBC | 20 | Cincinnati | 11.8% | 206 | 21 | 10.19% | 0.864 |
| 75 | WWJ | NBC | 5 | Detroit | 19.9% | 149 | 15 | 10.07% | 0.506 |
| 76 | KMGH | CBS | 32 | Denver | 16.8% | 120 | 12 | 10.00% | 0.595 |
| 77 | WXYZ | ABC | 5 | Detroit | 19.9% | 213 | 21 | 9.86% | 0.495 |
| 78 | KMBC | ABC | 23 | Kansas City | 14.6% | 103 | 10 | 9.71% | 0.665 |
| 79 | KOVR | ABC | 27 | Sacramento-Stockton | 22.0% | 103 | 10 | 9.71% | 0.441 |
| 80 | WLWI | ABC | 14 | Indianapolis | 13.4% | 93 | 9 | 9.68% | 0.722 |
| 81 | WJZ | ABC | 19 | Baltimore | 25.1% | 137 | 13 | 9.49% | 0.378 |
| 82 | WRTV | NBC | 14 | Indianapolis | 13.4% | 127 | 12 | 9.45% | 0.705 |
| 83 | KCMO | CBS | 23 | Kansas City | 14.6% | 96 | 9 | 9.38% | 0.642 |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| 84 | WGR | NBC | 25 | Buffalo | 9.9% | 86 | 8 | 9.30% | 0.940 |
| 85 | WKY | NBC | 41 | Oklahoma City | 12.6% | 119 | 11 | 9.24% | 0.734 |
| 86 | WLAC | CBS | 30 | Nashville | 18.7% | 119 | 11 | 9.24% | 0.494 |
| 87 | WLOS | ABC | 40 | Gainesville-Spartanburg-Ashville | 13.6% | 76 | 7 | 9.21% | 0.677 |
| 88 | WWL | CBS | 31 | New Orleans | 35.6% | 109 | 10 | 9.17% | 0.258 |
| 89 | WNAC | CBS | 6 | Boston | 6.8% | 167 | 15 | 8.98% | 1.321 |
| 90 | WTOL | CBS | 45 | Toledo | 10.5% | 79 | 7 | 8.86% | 0.844 |
| 91 | WFBC | NBC | 40 | Gnville-Sptnbg-Ashvi | 13.6% | 57 | 5 | 8.77% | 0.645 |
| 92 | WISH | CBS | 14 | Indianapolis | 13.4% | 80 | 7 | 8.75% | 0.653 |
| 93 | KGW | NBC | 26 | Portland | 5.2% | 126 | 11 | 8.73% | 1.679 |
| 94 | KXTV | CBS | 27 | Sacramento-Stockton | 22.0% | 81 | 7 | 8.64% | 0.393 |
| 95 | WSAZ | NBC | 33 | Charleston-Huntingto | 4.7% | 81 | 7 | 8.64% | 1.839 |
| 96 | WIIC | NBC | 9 | Pittsburgh | 7.8% | 144 | 12 | 8.33% | 1.068 |
| 97 | WCCB | ABC | 35 | Charlotte | 23.9% | 24 | 2 | 8.33% | 0.349 |
| 98 | WTEV | ABC | 34 | Providence | 3.4% | 72 | 6 | 8.33% | 2.451 |
| 99 | WTIC | CBS | 22 | Hartford-New Haven | 11.8% | 144 | 12 | 8.33% | 0.706 |
| 100 | WBTV | CBS | 35 | Charlotte | 23.9% | 121 | 10 | 8.26% | 0.346 |
| 101 | WOTV | NBC | 41 | Kalamazoo-Gr Rapids | 6.1% | 109 | 9 | 8.26% | 1.354 |
| 102 | WAVE | NBC | 36 | Louisville | 13.0% | 110 | 9 | 8.18% | 0.629 |
| 103 | WTVT | CBS | 24 | Tampa-St. Petersburg | 16.8% | 123 | 10 | 8.13% | 0.484 |
| 104 | WSPA | CBS | 40 | Gnville-Sptnbg-Ashvi | 13.6% | 74 | 6 | 8.11% | 0.596 |
| 105 | WHEN | CBS | 43 | Syracuse | 5.0% | 75 | 6 | 8.00% | 1.600 |
| 106 | WEWS | ABC | 7 | Cleveland | 17.6% | 140 | 11 | 7.86% | 0.446 |
| 107 | WHTN | ABC | 33 | Charleston-Huntingto | 4.7% | 51 | 4 | 7.84% | 1.669 |
| 108 | WTMJ | NBC | 21 | Milwaukee | 9.8% | 146 | 11 | 7.53% | 0.769 |
| 109 | WTNH | ABC | 22 | Hartford-New Haven | 11.8% | 81 | 6 | 7.41% | 0.628 |
| 110 | WCHS | CBS | 33 | Charleston-Huntingto | 4.7% | 54 | 4 | 7.41% | 1.576 |
| 111 | WHNB | NBC | 22 | Hartford-New Haven | 11.8% | 69 | 5 | 7.25% | 0.614 |
| 112 | WLKY | ABC | 36 | Louisville | 13.0% | 56 | 4 | 7.14% | 0.549 |
| 113 | KBTV | ABC | 32 | Denver | 16.8% | 113 | 8 | 7.08% | 0.421 |
| 114 | WZZM | ABC | 41 | Kalamazoo-Gr Rapids | 6.1% | 71 | 5 | 7.04% | 1.154 |
| 115 | WSM | NBC | 30 | Nashville | 18.7% | 114 | 8 | 7.02% | 0.375 |
| 116 | WSPD | NBC | 45 | Toledo | 10.5% | 86 | 6 | 6.98% | 0.664 |
| 117 | KSD | NBC | 12 | St. Louis | 17.3% | 115 | 8 | 6.96% | 0.402 |
| 118 | WSYR | NBC | 43 | Syracuse | 5.0% | 101 | 7 | 6.93% | 1.386 |
| 119 | WTAE | ABC | 9 | Pittsburgh | 7.8% | 130 | 9 | 6.92% | 0.888 |
| 120 | WDAF | NBC | 23 | Kansas City | 14.6% | 73 | 5 | 6.85% | 0.469 |
| 121 | KIRO | CBS | 16 | Seattle-Tacoma | 8.0% | 119 | 8 | 6.72% | 0.840 |
| 122 | WPRI | CBS | 34 | Providence | 3.4% | 76 | 5 | 6.58% | 1.935 |
| 123 | WAPI | NBC | 38 | Birmingham | 30.0% | 61 | 4 | 6.56% | 0.219 |
| 124 | WVEC | ABC | 44 | Norfolk-Newport News-Hampton | 27.3% | 78 | 5 | 6.41% | 0.235 |
| 125 | WAST | ABC | 37 | Albany-Schenectady-Troy | 4.4% | 63 | 4 | 6.35% | 1.443 |
| 126 | KATU | ABC | 26 | Portland | 5.2% | 98 | 6 | 6.12% | 1.177 |
| 127 | WXII | NBC | 48 | Greensboro-High Point-Winston Salem | 20.3% | 87 | 5 | 5.75% | 0.283 |
| 128 | WTEN | CBS | 37 | Albany-Schenectady-T | 4.4% | 76 | 4 | 5.26% | 1.196 |
| 129 | KOIN | CBS | 26 | Portland | 5.2% | 98 | 5 | 5.10% | 0.981 |
| 130 | WITI | ABC | 21 | Milwaukee | 9.8% | 120 | 6 | 5.00% | 0.510 |
| 131 | WHAS | CBS | 36 | Louisville | 13.0% | 105 | 5 | 4.76% | 0.306 |
| 132 | KOA | NBC | 32 | Denver | 16.8% | 87 | 4 | 4.60% | 0.274 |
| 133 | WCPO | CBS | 20 | Cincinnati | 11.8% | 134 | 6 | 4.48% | 0.379 |

### *Network Affiliates Ranked by Percent Minorities Employed*—Continued

| Rank | Call letters | Net. aff. | Mkt. No. | Location | SMSA | Total employes | Minorities employed | |  Factor |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Number | percent | |
| 134 | KOMO | ABC | 16 | Seattle-Tacoma | 8.0% | 158 | 7 | 4.43% | 0.554 |
| 135 | WLCY | ABC | 24 | Tampa-St. Petersburg | 16.8% | 70 | 3 | 4.29% | 0.255 |
| 136 | WISN | CBS | 21 | Milwaukee | 9.8% | 101 | 4 | 3.96% | 0.404 |
| 137 | KCPX | ABC | 50 | Salt Lake City | 6.9% | 81 | 3 | 3.70% | 0.537 |
| 138 | WBEN | CBS | 25 | Buffalo | 9.9% | 136 | 5 | 3.68% | 0.371 |
| 139 | WCCO | CBS | 13 | Minneapolis-St. Paul | 3.7% | 201 | 7 | 3.48% | 0.941 |
| 140 | WJAR | NBC | 34 | Providence | 3.4% | 102 | 3 | 2.94% | 0.865 |
| 141 | WDHO | ABC | 45 | Toledo | 10.5% | 41 | 1 | 2.44% | 0.232 |
| 142 | KSTP | NBC | 13 | Minneapolis-St. Paul | 3.7% | 158 | 3 | 1.90% | 0.513 |
| 143 | WRGB | NBC | 37 | Albany-Schenectady-Troy | 4.4% | 78 | 1 | 1.28% | 0.291 |
| 144 | KUTV | NBC | 50 | Salt Lake City | 6.9% | 87 | 1 | 1.15% | 0.167 |
| 145 | KSL | CBS | 50 | Salt Lake City | 6.9% | 137 | 1 | 0.73% | 0.106 |
| 146 | KMSP | ABC | 13 | Minneapolis-St. Paul | 3.7% | 59 | 0 | 0.0% | 0.0 |
| 147 | WKZO | CBS | 41 | Kalamazoo-Gr Rapids | 6.1% | 69 | 0 | 0.0% | 0.0 |

### *Network Affiliates Ranked by Percent Minorities Employed*

| Rank | Call letters | Net. aff. | Mkt. No. | Location | SMSA | Total employes | Minorities employed | | Factor |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Number | Percent | |
| 9 | WNBC | NBC | 1 | New York City | 30.0% | 237 | 44 | 18.57% | 0.719 |
| 11 | WCBS | CBS | 1 | New York City | 30.0% | 280 | 50 | 17.86% | 0.595 |
| 30 | WABC | ABC | 1 | New York City | 30.0% | 189 | 28 | 14.81% | 0.494 |
| 1 | KABC | ABC | 2 | Los Angeles | 32.9% | 192 | 55 | 28.65% | 0.871 |
| 5 | KNBC | NBC | 2 | Los Angeles | 32.9% | 229 | 50 | 21.83% | 0.664 |
| 37 | KNXT | CBS | 2 | Los Angeles | 32.9% | 317 | 44 | 13.88% | 0.422 |
| 22 | WMAQ | NBC | 3 | Chicago | 23.4% | 342 | 54 | 15.79% | 0.675 |
| 28 | WLS | ABC | 3 | Chicago | 23.4% | 274 | 41 | 14.96% | 0.639 |
| 43 | WBBM | CBS | 3 | Chicago | 23.4% | 300 | 39 | 13.00% | 0.556 |
| 42 | WPVI | ABC | 4 | Philadelphia | 19.8% | 153 | 20 | 13.07% | 0.660 |
| 44 | WCAU | CBS | 4 | Philadelphia | 19.8% | 70 | 9 | 12.86% | 0.619 |
| 54 | KYW | NBC | 4 | Philadelphia | 19.8% | 202 | 24 | 11.88% | 0.600 |
| 19 | WJBK | CBS | 5 | Detroit | 19.9% | 190 | 31 | 16.32% | 0.820 |
| 75 | WWJ | NBC | 5 | Detroit | 19.9% | 149 | 15 | 10.07% | 0.506 |
| 77 | WXYZ | ABC | 5 | Detroit | 19.9% | 213 | 21 | 9.86% | 0.495 |
| 40 | WBZ | NBC | 6 | Boston | 6.8% | 175 | 23 | 13.14% | 1.933 |
| 89 | WNAC | CBS | 6 | Boston | 6.8% | 167 | 15 | 8.98% | 1.321 |
| 13 | WKYC | NBC | 7 | Cleveland | 17.6% | 193 | 34 | 17.62% | 1.001 |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| 55 | WJW | CBS | 7 | Cleveland | 17.6% | 152 | 18 | 11.84% | 0.673 |
| 106 | WEWS | ABC | 7 | Cleveland | 17.6% | 140 | 11 | 7.86% | 0.446 |
| 3 | KGO | ABC | 8 | San Francisco | 28.9% | 224 | 52 | 23.21% | 0.803 |
| 8 | KPIX | CBS | 8 | San Francisco | 28.9% | 165 | 31 | 18.79% | 0.650 |
| 51 | KRON | NBC | 8 | San Francisco | 28.9% | 207 | 25 | 12.08% | 0.418 |
| 59 | KDKA | CBS | 9 | Pittsburgh | 7.8% | 167 | 19 | 11.38% | 1.459 |
| 96 | WIIC | NBC | 9 | Pittsburgh | 7.8% | 144 | 12 | 8.33% | 1.068 |
| 119 | WTAE | ABC | 9 | Pittsburgh | 7.8% | 130 | 9 | 6.92% | 0.888 |
| 4 | WRC | NBC | 10 | Washington, D.C | 28.3% | 227 | 51 | 22.47% | 0.794 |
| 12 | WTOP | CBS | 10 | Washington, D.C | 28.3% | 136 | 24 | 17.65% | 0.624 |
| 27 | WMAL | ABC | 10 | Washington D.C | 28.3% | 140 | 21 | 15.00% | 0.530 |
| 53 | KDFW | CBS | 11 | Dallas-Fort Worth | 21.3% | 134 | 16 | 11.94% | 0.561 |
| 65 | WFAA | ABC | 11 | Dallas-Fort Worth | 21.3% | 186 | 20 | 10.75% | 0.505 |
| 67 | WBAP | NBC | 11 | Dallas-Fort Worth | 21.3% | 141 | 15 | 10.64% | 0.499 |
| 24 | KMOX | CBS | 12 | St. Louis | 17.3% | 148 | 23 | 15.54% | 0.898 |
| 72 | KTVI | ABC | 12 | St. Louis | 17.3% | 107 | 11 | 10.28% | 0.594 |
| 117 | KSD | NBC | 12 | St. Louis | 17.3% | 115 | 8 | 6.96% | 0.402 |
| 139 | WCCO | CBS | 13 | Minneapolis-St. Paul | 3.7% | 201 | 7 | 3.48% | 0.941 |
| 142 | KSIP | NBC | 13 | Minneapolis-St. Paul | 3.7% | 158 | 3 | 1.90% | 0.513 |
| 146 | KMSP | ABC | 13 | Minneapolis-St. Paul | 3.7% | 59 | 0 | 0.0% | 0.0 |
| 80 | WLWI | ABC | 14 | Indianapolis | 13.4% | 93 | 9 | 9.68% | 0.722 |
| 82 | WRTV | NBC | 14 | Indianapolis | 13.4% | 127 | 12 | 9.45% | 0.705 |
| 92 | WISH | CBS | 14 | Indianapolis | 13.4% | 80 | 7 | 8.75% | 0.653 |
| 29 | KTRK | ABC | 15 | Houston | 30.8% | 101 | 15 | 14.85% | 0.482 |
| 38 | KHOU | CBS | 15 | Houston | 30.8% | 94 | 13 | 13.83% | 0.449 |
| 61 | KPRC | NBC | 15 | Houston | 30.8% | 125 | 14 | 11.20% | 0.364 |
| 36 | KING | NBC | 16 | Seattle-Tacoma | 8.0% | 136 | 19 | 13.97% | 1.746 |
| 121 | KIRO | CBS | 16 | Seattle-Tacoma | 8.0% | 119 | 8 | 6.72% | 0.840 |
| 134 | KOMO | ABC | 16 | Seattle-Tacoma | 8.0% | 158 | 7 | 4.43% | 0.554 |
| 33 | WAGA | CBS | 17 | Atlanta | 23.6% | 141 | 20 | 14.18% | 0.601 |
| 35 | WQXI | ABC | 17 | Atlanta | 23.6% | 114 | 16 | 14.04% | 0.595 |
| 58 | WSB | NBC | 17 | Atlanta | 23.6% | 149 | 17 | 11.41% | 0.483 |
| 20 | WTVJ | CBS | 18 | Miami | 39.1% | 155 | 25 | 16.13% | 0.413 |
| 23 | WCKT | NBC | 18 | Miami | 39.1% | 134 | 21 | 15.67% | 0.401 |
| 25 | WPLG | ABC | 18 | Miami | 39.1% | 137 | 21 | 15.33% | 0.392 |
| 21 | WBAL | NBC | 19 | Baltimore | 25.1% | 149 | 24 | 16.11% | 0.642 |
| 64 | WMAR | CBS | 19 | Baltimore | 25.1% | 147 | 16 | 10.88% | 0.434 |
| 81 | WJZ | ABC | 19 | Baltimore | 25.1% | 137 | 13 | 9.49% | 0.378 |
| 66 | WKRC | ABC | 20 | Cincinnati | 11.8% | 84 | 9 | 10.71% | 0.908 |
| 74 | WLWT | NBC | 20 | Cincinnati | 11.8% | 206 | 21 | 10.19% | 0.864 |
| 133 | WCPO | CBS | 20 | Cincinnati | 11.8% | 134 | 6 | 4.48% | 0.379 |
| 108 | WTMJ | NBC | 21 | Milwaukee | 9.8% | 146 | 11 | 7.53% | 0.769 |
| 130 | WITI | ABC | 21 | Milwaukee | 9.8% | 120 | 6 | 5.00% | 0.510 |
| 136 | WISN | CBS | 21 | Milwaukee | 9.8% | 101 | 4 | 3.96% | 0.404 |
| 99 | WTIC | CBS | 22 | Hartford-New Haven | 11.8% | 144 | 12 | 8.33% | 0.706 |
| 109 | WTNH | ABC | 22 | Hartford-New Haven | 11.8% | 81 | 6 | 7.41% | 0.628 |
| 111 | WHNB | NBC | 22 | Hartford-New Haven | 11.8% | 69 | 5 | 7.25% | 0.614 |
| 78 | KMBC | ABC | 23 | Kansas City | 14.6% | 103 | 10 | 9.71% | 0.665 |
| 83 | KCMO | CBS | 23 | Kansas City | 14.6% | 96 | 9 | 9.38% | 0.642 |
| 120 | WDAF | NBC | 23 | Kansas City | 14.6% | 73 | 5 | 6.85% | 0.469 |

*Network Affiliates Ranked by Percent Minorities Employed*—Continued

| Rank | Call letters | Net. aff. | Mkt. No. | Location | SMSA | Total employes | Minorities employed | | Factor |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Number | percent | |
| 39 | WFLA | NBC | 24 | Tampa-St. Petersburg | 16.8% | 124 | 17 | 13.71% | 0.810 |
| 103 | WTVT | CBS | 24 | Tampa-St. Petersburg | 16.8% | 123 | 10 | 8.13% | 0.486 |
| 135 | WLCY | ABC | 24 | Tampa-St. Petersburg | 16.8% | 70 | 3 | 4.29% | 0.254 |
| 70 | WKBW | ABC | 25 | Buffalo | 9.9% | 87 | 9 | 10.34% | 1.045 |
| 84 | WGR | NBC | 25 | Buffalo | 9.9% | 86 | 8 | 9.30% | 0.940 |
| 138 | WBEN | CBS | 25 | Buffalo | 9.9% | 136 | 5 | 3.68% | 0.371 |
| 93 | KGW | NBC | 26 | Portland | 5.2% | 126 | 11 | 8.73% | 1.679 |
| 126 | KATU | ABC | 26 | Portland | 5.2% | 98 | 6 | 6.12% | 1.177 |
| 129 | KOIN | CBS | 26 | Portland | 5.2% | 98 | 5 | 5.10% | 0.981 |
| 56 | KCRA | NBC | 27 | Sacramento-Stockton | 22.0% | 128 | 15 | 11.72% | 0.533 |
| 79 | KOVR | ABC | 27 | Sacramento-Stockton | 22.0% | 103 | 10 | 9.71% | 0.441 |
| 94 | KXTV | CBS | 27 | Sacramento-Stockton | 22.0% | 81 | 7 | 8.64% | 0.393 |
| 14 | WLWC | NBC | 28 | Columbus | 12.6% | 93 | 16 | 17.20% | 1.365 |
| 17 | WTVN | ABC | 28 | Columbus | 12.6% | 90 | 15 | 16.67% | 1.323 |
| 62 | WBNS | CBS | 28 | Columbus | 12.6% | 127 | 14 | 11.02% | 0.875 |
| 15 | WREC | CBS | 29 | Memphis | 38.4% | 71 | 12 | 16.90% | 0.440 |
| 18 | WHBQ | ABC | 29 | Memphis | 38.4% | 78 | 13 | 16.67% | 0.434 |
| 63 | WMC | NBC | 29 | Memphis | 38.4% | 82 | 9 | 10.98% | 0.286 |
| 57 | WSIX | ABC | 30 | Nashville | 18.7% | 70 | 8 | 11.43% | 0.611 |
| 86 | WLAC | CBS | 30 | Nashville | 18.7% | 119 | 11 | 9.24% | 0.494 |
| 115 | WSM | NBC | 30 | Nashville | 18.7% | 114 | 8 | 7.02% | 0.375 |
| 31 | WDSU | NBC | 31 | New Orleans | 35.6% | 136 | 20 | 14.71% | 0.413 |
| 32 | WVUE | ABC | 31 | New Orleans | 35.6% | 90 | 13 | 14.44% | 0.406 |
| 88 | WWL | CBS | 31 | New Orleans | 35.6% | 109 | 10 | 9.17% | 0.258 |
| 76 | KMGH | CBS | 32 | Denver | 16.8% | 120 | 12 | 10.00% | 0.595 |
| 113 | KBTV | ABC | 32 | Denver | 16.8% | 113 | 8 | 7.08% | 0.421 |
| 132 | KOA | NBC | 32 | Denver | 16.8% | 87 | 4 | 4.60% | 0.274 |
| 95 | WSAZ | NBC | 33 | Charleston-Huntingto | 4.7% | 81 | 7 | 8.64% | 1.839 |
| 107 | WHTN | ABC | 35 | Charleston-Huntingto | 4.7% | 51 | 4 | 7.84% | 1.669 |
| 110 | WCHS | CBS | 33 | Charleston-Huntingto | 4.7% | 54 | 4 | 7.41% | 1.576 |
| 98 | WTEV | ABC | 34 | Providence | 3.4% | 72 | 6 | 8.33% | 2.451 |
| 122 | WPRI | CBS | 34 | Providence | 3.4% | 76 | 5 | 6.58% | 1.935 |
| 140 | WJAR | NBC | 34 | Providence | 3.4% | 102 | 3 | 2.94% | 0.865 |
| 47 | WSOC | NBC | 35 | Charlotte | 23.9% | 114 | 14 | 12.28% | 0.514 |
| 97 | WCCR | ABC | 35 | Charlotte | 23.9% | 24 | 2 | 8.33% | 0.349 |
| 100 | WBTV | CBS | 35 | Charlotte | 23.9% | 121 | 10 | 8.26% | 0.346 |
| 102 | WAVE | NBC | 36 | Louisville | 13.0% | 110 | 9 | 8.18% | 0.629 |
| 112 | WLKY | ABC | 36 | Louisville | 13.0% | 56 | 4 | 7.14% | 0.549 |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| 131 | WHAS | CBS | 36 | Louisville | 13.0% | 105 | 5 | 4.76% | 0.365 |
| 125 | WAST | ABC | 37 | Albany-Schenectady-T | 4.4% | 63 | 4 | 6.35% | 1.443 |
| 128 | WTEN | CBS | 37 | Albany-Schenectady-T | 4.4% | 76 | 4 | 5.26% | 1.196 |
| 143 | WRGB | NBC | 37 | Albany-Schenectady-T | 4.4% | 78 | 1 | 1.28% | 0.291 |
| 50 | WBMG | CBS | 38 | Birmingham | 30.0% | 33 | 4 | 12.12% | 0.404 |
| 52 | WBRC | ABC | 38 | Birmingham | 30.0% | 83 | 10 | 12.05% | 0.402 |
| 123 | WAPI | NBC | 38 | Birmingham | 30.0% | 61 | 4 | 6.56% | 0.219 |
| 41 | WHIO | CBS | 39 | Dayton | 11.9% | 122 | 16 | 13.11% | 1.102 |
| 72 | WLWD | NBC | 39 | Dayton | 11.9% | 107 | 11 | 10.28% | 0.864 |
| 87 | WLOS | ABC | 40 | Gainesville-Spartanburg-Ashville | 13.6% | 76 | 7 | 9.21% | 0.677 |
| 91 | WFBC | NBC | 40 | Gainesville-Spartanburg-Ashville | 13.6% | 57 | 5 | 8.77% | 0.645 |
| 104 | WSPA | CBS | 40 | Gainesville-Spartanburg-Ashville | 13.6% | 74 | 6 | 8.11% | 0.596 |
| 101 | WOTV | NBC | 41 | Kalamazoo-Grand Rapids | 6.1% | 109 | 9 | 8.26% | 1.354 |
| 114 | WZZM | ABC | 41 | Kalamazoo-Grand Rapids | 6.1% | 71 | 5 | 7.04% | 1.154 |
| 147 | WKZO | CBS | 41 | Kalamazoo-Grand Rapids | 6.1% | 69 | 0 | 0.0% | 0.0 |
| 10 | KWTV | CBS | 41 | Oklahoma City | 12.6% | 88 | 16 | 18.18% | 1.443 |
| 16 | KOCO | ABC | 41 | Oklahoma City | 12.6% | 77 | 13 | 16.88% | 1.340 |
| 85 | WKY | NBC | 41 | Oklahoma City | 12.6% | 119 | 11 | 9.24% | 0.734 |
| 69 | WNYS | ABC | 43 | Syracuse | 5.0% | 77 | 8 | 10.39% | 2.078 |
| 105 | WHEN | CBS | 43 | Syracuse | 5.0% | 75 | 6 | 8.00% | 1.600 |
| 118 | WSYR | NBC | 43 | Syracuse | 5.0% | 101 | 7 | 6.93% | 1.386 |
| 34 | WAVY | NBC | 44 | Norfolk-Newport News-Hampton | 27.3% | 71 | 10 | 14.08% | 0.516 |
| 48 | WOAR | CBS | 44 | Norfolk-Newport News-Hampton | 27.3% | 106 | 13 | 12.26% | 0.449 |
| 124 | WVFC | ABC | 44 | Norfolk-Newport News-Hampton | 27.3% | 78 | 5 | 6.41% | 0.235 |
| 26 | KTAR | NBC | 45 | Phoenix | 20.0% | 113 | 17 | 15.04% | 0.752 |
| 46 | KOOL | CBS | 45 | Phoenix | 20.0% | 105 | 13 | 12.38% | 0.619 |
| 73 | KIVK | ABC | 45 | Phoenix | 20.0% | 78 | 8 | 10.26% | 0.513 |
| 2 | KENS | CBS | 45 | San Antonio | 52.6% | 70 | 17 | 24.29% | 0.462 |
| 6 | KSAT | ABC | 45 | San Antonio | 52.6% | 80 | 17 | 21.25% | 0.404 |
| 7 | WOAI | NBC | 45 | San Antonio | 52.6% | 90 | 19 | 21.11% | 0.401 |
| 90 | WIOL | CBS | 45 | Toledo | 10.5% | 79 | 7 | 8.86% | 0.844 |
| 116 | WSPD | NBC | 45 | Toledo | 10.5% | 86 | 6 | 6.98% | 0.664 |
| 141 | WDHO | ABC | 45 | Toledo | 10.5% | 41 | 1 | 2.44% | 0.232 |
| 60 | WIMY | CBS | 48 | Greensboro-High Point-Winston-Salem | 20.3% | 89 | 10 | 11.24% | 0.553 |
| 68 | WGHP | ABC | 48 | Greensboro-High Point-Winston-Salem | 20.3% | 67 | 7 | 10.45% | 0.515 |
| 127 | WXII | NBC | 48 | Greensboro-High Point-Winston-Salom | 20.3% | 87 | 5 | 5.75% | 0.283 |
| 45 | KFMB | CBS | 49 | San Diego | 20.6% | 113 | 14 | 12.39% | 0.601 |
| 49 | KGTV | NBC | 49 | San Diego | 20.6% | 132 | 16 | 12.12% | 0.588 |
| 137 | KCPX | ABC | 50 | Salt Lake City | 6.9% | 81 | 3 | 3.70% | 0.537 |
| 144 | KUTV | NBC | 50 | Salt Lake City | 6.9% | 87 | 1 | 1.15% | 0.167 |
| 145 | KSL | CBS | 50 | Salt Lake City | 6.9% | 137 | 1 | 0.73% | 0.106 |

*Network Affiliates Ranked by Ratio of Percent Minorities Employed to Percent Minorities in SMSA*—Continued

| Rank | Call letters | Net. aff. | Mkt. No. | Location | SMSA | Total employes | Minorities employed | | Factor |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Number | Percent | |
| 68 | WNBC | NBC | 1 | New York City | 30.0% | 237 | 44 | 18.57% | 0.619 |
| 76 | WCBS | CBS | 1 | New York City | 30.0% | 280 | 50 | 17.86% | 0.595 |
| 99 | WABC | ABC | 1 | New York City | 30.0% | 189 | 28 | 14.81% | 0.494 |
| 34 | KABC | ABC | 2 | Los Angeles | 32.9% | 192 | 55 | 28.65% | 0.871 |
| 55 | KNBC | NBC | 2 | Los Angeles | 32.9% | 229 | 50 | 21.83% | 0.664 |
| 112 | KNXT | CBS | 2 | Los Angeles | 32.9% | 317 | 44 | 13.88% | 0.422 |
| 51 | WMAQ | NBC | 3 | Chicago | 23.4% | 342 | 54 | 15.79% | 0.675 |
| 63 | WLS | ABC | 3 | Chicago | 23.4% | 274 | 41 | 14.96% | 0.639 |
| 81 | WBBM | CBS | 3 | Chicago | 23.4% | 300 | 39 | 13.00% | 0.556 |
| 56 | WPVI | ABC | 4 | Philadelphia | 19.8% | 153 | 20 | 13.07% | 0.660 |
| 59 | WCAU | CBS | 4 | Philadelphia | 19.8% | 70 | 9 | 12.86% | 0.649 |
| 73 | KYW | NBC | 4 | Philadelphia | 19.8% | 202 | 24 | 11.88% | 0.600 |
| 40 | WJBK | CBS | 5 | Detroit | 19.9% | 190 | 31 | 16.32% | 0.820 |
| 94 | WWJ | NBC | 5 | Detroit | 19.9% | 149 | 15 | 10.07% | 0.506 |
| 97 | WXYZ | ABC | 5 | Detroit | 19.9% | 213 | 21 | 9.86% | 0.495 |
| 4 | WBZ | NBC | 6 | Boston | 6.8% | 175 | 23 | 13.14% | 1.933 |
| 19 | WNAC | CBS | 6 | Boston | 6.8% | 167 | 15 | 8.98% | 1.321 |
| 26 | WKYC | NBC | 7 | Cleveland | 17.6% | 193 | 34 | 17.62% | 1.001 |
| 52 | WJW | CBS | 7 | Cleveland | 17.6% | 152 | 18 | 11.84% | 0.673 |
| 107 | WEWS | ABC | 7 | Cleveland | 17.6% | 140 | 11 | 7.86% | 0.446 |
| 42 | KGO | ABC | 8 | San Francisco | 28.9% | 224 | 52 | 23.21% | 0.803 |
| 58 | KPIX | CBS | 8 | San Francisco | 28.9% | 165 | 31 | 18.79% | 0.650 |
| 114 | KRON | NBC | 8 | San Francisco | 28.9% | 207 | 25 | 12.08% | 0.418 |
| 11 | KDKA | CBS | 9 | Pittsburgh | 7.8% | 167 | 19 | 11.38% | 1.459 |
| 24 | WIIC | NBC | 9 | Pittsburgh | 7.8% | 144 | 12 | 8.33% | 1.068 |
| 32 | WTAE | ABC | 9 | Pittsburgh | 7.8% | 130 | 9 | 6.92% | 0.888 |
| 43 | WRC | NBC | 10 | Washington D.C | 28.3% | 227 | 51 | 22.47% | 0.794 |
| 66 | WTOP | CBS | 10 | Washington D.C | 28.3% | 136 | 24 | 17.65% | 0.624 |
| 87 | WMAL | ABC | 10 | Washington D.C | 28.3% | 140 | 21 | 15.00% | 0.530 |
| 80 | KDFW | CBS | 11 | Dallas-Fort Worth | 21.3% | 134 | 16 | 11.94% | 0.561 |
| 95 | WFAA | ABC | 11 | Dallas-Fort Worth | 21.3% | 186 | 20 | 10.75% | 0.505 |
| 96 | WBAP | NBC | 11 | Dallas-Fort Worth | 21.3% | 141 | 15 | 10.64% | 0.499 |
| 31 | KMOX | CBS | 12 | St. Louis | 17.3% | 148 | 23 | 15.54% | 0.898 |
| 78 | KTVI | ABC | 12 | St. Louis | 17.3% | 107 | 11 | 10.28% | 0.594 |
| 121 | KSD | NBC | 12 | St. Louis | 17.3% | 115 | 8 | 6.96% | 0.402 |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| 28 | WCCO | CBS | 13 | Minneapolis-St. Paul | 3.7% | 201 | 7 | 3.48% | 0.941 |
| 91 | KSTP | NBC | 13 | Minneapolis-St. Paul | 3.7% | 158 | 3 | 1.90% | 0.513 |
| 146 | KMSP | ABC | 13 | Minneapolis-St. Paul | 3.7% | 59 | 0 | 0.0 % | 0.0 |
| 47 | WLWI | ABC | 14 | Indianapolis | 13.4% | 93 | 9 | 9.68% | 0.722 |
| 49 | WRTV | NBC | 14 | Indianapolis | 13.4% | 127 | 12 | 9.45% | 0.705 |
| 57 | WISH | CBS | 14 | Indianapolis | 13.4% | 80 | 7 | 8.75% | 0.653 |
| 102 | KTRK | ABC | 15 | Houston | 30.8% | 101 | 15 | 14.85% | 0.482 |
| 106 | KHOU | CBS | 15 | Houston | 30.8% | 94 | 13 | 13.83% | 0.449 |
| 132 | KPRC | NBC | 15 | Houston | 30.8% | 125 | 14 | 11.20% | 0.364 |
| 6 | KING | NBC | 16 | Seattle-Tacoma | 8.0% | 136 | 19 | 13.97% | 1.746 |
| 39 | KIRO | CBS | 16 | Seattle-Tacoma | 8.0% | 119 | 8 | 6.72% | 0.840 |
| 82 | KOMO | ABC | 16 | Seattle-Tacoma | 8.0% | 158 | 7 | 4.43% | 0.554 |
| 72 | WAGA | CBS | 17 | Atlanta | 23.6% | 141 | 20 | 14.18% | 0.601 |
| 77 | WQXI | ABC | 17 | Atlanta | 23.6% | 114 | 16 | 14.04% | 0.595 |
| 101 | WSB | NBC | 17 | Atlanta | 23.6% | 149 | 17 | 11.41% | 0.483 |
| 116 | WTVJ | CBS | 18 | Miami | 39.1% | 155 | 25 | 16.13% | 0.413 |
| 124 | WCKT | NBC | 18 | Miami | 39.1% | 134 | 21 | 15.67% | 0.401 |
| 126 | WPLG | ABC | 18 | Miami | 39.1% | 137 | 21 | 15.33% | 0.392 |
| 62 | WBAL | NBC | 19 | Baltimore | 25.1% | 149 | 24 | 16.11% | 0.642 |
| 111 | WMAR | CBS | 19 | Baltimore | 25.1% | 147 | 16 | 10.88% | 0.434 |
| 128 | WJZ | ABC | 19 | Baltimore | 25.1% | 137 | 13 | 9.49% | 0.378 |
| 30 | WKRC | ABC | 20 | Cincinnati | 11.8% | 84 | 9 | 10.71% | 0.908 |
| 36 | WLWT | NBC | 20 | Cincinnati | 11.8% | 206 | 21 | 10.19% | 0.864 |
| 127 | WCPO | CBS | 20 | Cincinnati | 11.8% | 134 | 6 | 4.48% | 0.379 |
| 44 | WIMJ | NBC | 21 | Milwaukee | 9.8% | 146 | 11 | 7.53% | 0.769 |
| 93 | WITI | ABC | 21 | Milwaukee | 9.8% | 120 | 6 | 5.00% | 0.510 |
| 118 | WISN | CBS | 21 | Milwaukee | 9.8% | 101 | 4 | 3.96% | 0.404 |
| 48 | WTIC | CBS | 22 | Hartford-New Haven | 11.8% | 144 | 12 | 8.33% | 0.706 |
| 65 | WTNH | ABC | 22 | Hartford-New Haven | 11.8% | 81 | 6 | 7.41% | 0.628 |
| 69 | WHNB | NBC | 22 | Hartford-New Haven | 11.8% | 69 | 5 | 7.25% | 0.614 |
| 53 | KMBC | ABC | 23 | Kansas City | 14.6% | 103 | 10 | 9.71% | 0.665 |
| 61 | KCMO | CBS | 23 | Kansas City | 14.6% | 96 | 9 | 9.38% | 0.642 |
| 103 | WDAF | NBC | 23 | Kansas City | 14.6% | 73 | 5 | 6.85% | 0.469 |
| 41 | WFLA | NBC | 24 | Tampa-St. Petersburg | 16.8% | 124 | 17 | 13.71% | 0.816 |
| 100 | WTVT | CBS | 24 | Tampa-St. Petersburg | 16.8% | 123 | 10 | 8.13% | 0.484 |
| 140 | WLCY | ABC | 24 | Tampa-St. Petersburg | 16.8% | 70 | 3 | 4.29% | 0.255 |
| 25 | WKBW | ABC | 25 | Buffalo | 9.9% | 87 | 9 | 10.34% | 1.045 |
| 29 | WGR | NBC | 25 | Buffalo | 9.9% | 86 | 8 | 9.30% | 0.940 |
| 130 | WBEN | CBS | 25 | Buffalo | 9.9% | 136 | 5 | 3.68% | 0.371 |
| 7 | KOW | NBC | 26 | Portland | 5.2% | 126 | 11 | 8.73% | 1.679 |
| 21 | KATU | ABC | 26 | Portland | 5.2% | 98 | 6 | 6.12% | 1.177 |
| 27 | KOIN | CBS | 26 | Portland | 5.2% | 98 | 5 | 5.10% | 0.981 |
| 86 | KCRA | NBC | 27 | Sacramento-Stockton | 22.0% | 128 | 15 | 11.72% | 0.533 |

### Network Affiliates Ranked by Ratio of Percent-Minorities Employed to Percent Minorities in SMSA—Continued

| Rank | Call letters | Net. aff. | Mkt. No. | Location | SMSA | Total employes | Minorities employed | | Factor |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Number | percent | |
| 108 | KOVR | ABC | 27 | Sacramento-Stockton | 22.0% | 103 | 10 | 9.71% | 0.441 |
| 125 | KXIV | CBS | 27 | Sacramento-Stockton | 22.0% | 81 | 7 | 8.64% | 0.393 |
| 15 | WLWC | NBC | 28 | Columbus | 12.6% | 93 | 16 | 17.20% | 1.365 |
| 18 | WTVN | ABC | 28 | Columbus | 12.6% | 90 | 15 | 16.67% | 1.323 |
| 33 | WBNS | CBS | 28 | Columbus | 12.6% | 127 | 14 | 11.02% | 0.875 |
| 109 | WRFC | CBS | 29 | Memphis | 38.4% | 71 | 12 | 16.90% | 0.440 |
| 110 | WHBO | ABC | 29 | Memphis | 38.4% | 78 | 13 | 16.67% | 0.434 |
| 136 | WMC | NBC | 29 | Memphis | 38.4% | 82 | 9 | 10.98% | 0.286 |
| 70 | WSIX | ABC | 30 | Nashville | 18.7% | 70 | 8 | 11.43% | 0.611 |
| 98 | WLAC | CBS | 30 | Nashville | 18.7% | 119 | 11 | 9.24% | 0.494 |
| 120 | WSM | NBC | 30 | Nashville | 18.7% | 114 | 8 | 7.02% | 0.375 |
| 115 | WDSU | NBC | 31 | New Orleans | 35.6% | 136 | 2 | 14.71% | 0.413 |
| 117 | KVUE | ABC | 31 | New Orleans | 35.6% | 90 | 13 | 14.44% | 0.406 |
| 139 | WWL | CBS | 31 | New Orleans | 35.6% | 109 | 10 | 9.17% | 0.258 |
| 75 | KMGH | CBS | 32 | Denver | 16.8% | 120 | 12 | 10.00% | 0.595 |
| 113 | KBTV | ABC | 32 | Denver | 16.8% | 113 | 8 | 7.08% | 0.421 |
| 138 | KOA | NBC | 32 | Denver | 16.8% | 97 | 4 | 4.60% | 0.274 |
| 5 | WSAZ | NBC | 33 | Charleston-Huntingto | 4.7% | 81 | 7 | 8.64% | 1.839 |
| 8 | WHTN | ABC | 33 | Charleston-Huntingto | 4.7% | 51 | 4 | 7.84% | 1.669 |
| 10 | WCHS | CBS | 33 | Charleston-Huntingto | 4.7% | 54 | 4 | 7.41% | 1.576 |
| 1 | WTEV | ABC | 34 | Providence | 3.4% | 72 | 6 | 8.33% | 2.451 |
| 3 | WPRI | CBS | 34 | Providence | 3.4% | 76 | 5 | 6.58% | 1.935 |
| 85 | WJAR | NBC | 34 | Providence | 3.4% | 102 | 3 | 2.94% | 0.865 |
| 90 | WSOC | NBC | 35 | Charlotte | 23.9% | 114 | 14 | 12.28% | 0.514 |
| 133 | WCCB | ABC | 35 | Charlotte | 23.9% | 24 | 2 | 8.33% | 0.349 |
| 134 | WBTV | CBS | 35 | Charlotte | 23.9% | 121 | 10 | 8.26% | 0.346 |
| 64 | WAVE | NBC | 36 | Louisville | 13.0% | 110 | 9 | 8.18% | 0.629 |
| 84 | WLKY | ABC | 36 | Louisville | 13.0% | 56 | 4 | 7.14% | 0.549 |
| 131 | WHAS | CBS | 36 | Louisville | 13.0% | 105 | 5 | 4.76% | 0.366 |
| 12 | WAST | ABC | 37 | Albany-Schenectady-T | 4.4% | 63 | 4 | 6.35% | 1.443 |
| 20 | WTEN | CBS | 37 | Albany-Schenectady-T | 4.4% | 76 | 4 | 5.26% | 1.196 |
| 135 | WRGB | NBC | 37 | Albany-Schenectady-T | 4.4% | 78 | 1 | 1.28% | 0.291 |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| 119 | WBMG | CBS | 38 | Birmingham | 30.0% | 33 | 4 | 12.12% | 0.404 |
| 122 | WBRC | ABC | 38 | Birmingham | 30.0% | 83 | 10 | 12.05% | 0.402 |
| 143 | WPAI | NBC | 38 | Birmingham | 30.0% | 61 | 4 | 6.56% | 0.219 |
| 23 | WHIO | CBS | 39 | Dayton | 11.9% | 122 | 16 | 13.11% | 1.102 |
| 37 | WLWD | NBC | 39 | Dayton | 11.9% | 107 | 11 | 10.28% | 0.864 |
| 50 | WLOS | ABC | 40 | Gnville-Sptnbg-Ashvi | 13.6% | 76 | 7 | 9.21% | 0.677 |
| 60 | WFBC | NBC | 40 | Gnville-Sptnbg-Ashvi | 13.6% | 57 | 5 | 8.77% | 0.645 |
| 74 | WSPA | CBS | 40 | Gnville-Sptnbg-Ashvi | 13.6% | 74 | 6 | 8.11% | 0.596 |
| 16 | WOTV | NBC | 41 | Kalamazoo-Gr. Rapids | 6.1% | 109 | 9 | 8.26% | 1.354 |
| 22 | WZZM | ABC | 41 | Kalamazoo-Gr. Rapids | 6.1% | 71 | 5 | 7.04% | 1.154 |
| 147 | WKZO | CBS | 41 | Kalamazoo-Gr. Rapids | 6.1% | 69 | 0 | 0.0% | 0.0 |
| 13 | KWTV | CBS | 41 | Oklahoma City | 12.6% | 88 | 16 | 18.18% | 1.443 |
| 17 | KOCO | ABC | 41 | Oklahoma City | 12.6% | 77 | 13 | 16.88% | 1.340 |
| 46 | WKY | NBC | 41 | Oklahoma City | 12.6% | 119 | 11 | 9.24% | 0.734 |
| 2 | WNYS | ABC | 43 | Syracuse | 5.0% | 77 | 8 | 10.39% | 2.078 |
| 9 | WHEN | CBS | 43 | Syracuse | 5.0% | 75 | 6 | 8.00% | 1.600 |
| 14 | WSYR | NBC | 43 | Syracuse | 5.0% | 101 | 7 | 6.93% | 1.386 |
| 88 | WAVY | NBC | 44 | Norf-Newp News-Hamp | 27.3% | 71 | 10 | 14.08% | 0.516 |
| 105 | WTAR | CBS | 44 | Norf-Newp News-Hamp | 27.3% | 106 | 13 | 12.26% | 0.449 |
| 141 | WVEC | ABC | 44 | Norf-Newp News-Hamp | 27.3% | 78 | 5 | 6.41% | 0.235 |
| 45 | KTAR | NBC | 45 | Phoenix | 20.0% | 113 | 17 | 15.04% | 0.752 |
| 67 | KOOL | CBS | 45 | Phoenix | 20.0% | 105 | 13 | 12.38% | 0.619 |
| 92 | KTVK | ABC | 45 | Phoenix | 20.0% | 78 | 8 | 10.26% | 0.513 |
| 104 | KENS | CBS | 45 | San Antonio | 52.6% | 70 | 17 | 24.29% | 0.462 |
| 120 | KSAT | ABC | 45 | San Antonio | 52.6% | 80 | 17 | 21.25% | 0.404 |
| 123 | WOAI | NBC | 45 | San Antonio | 52.6% | 90 | 19 | 21.11% | 0.401 |
| 38 | WTOL | CBS | 45 | Toledo | 10.5% | 79 | 7 | 8.86% | 0.844 |
| 54 | WSPD | NBC | 45 | Toledo | 10.5% | 86 | 6 | 6.98% | 0.664 |
| 142 | WDHO | ABC | 45 | Toledo | 10.5% | 41 | 1 | 2.44% | 0.232 |
| 83 | WFMY | CBS | 48 | Gnsb-High Pt.-Win Sal | 20.3% | 89 | 10 | 11.24% | 0.553 |
| 89 | WGHP | ABC | 48 | Gnsb-High Pt.-Win Sal | 20.3% | 67 | 7 | 10.45% | 0.515 |
| 137 | WXII | NBC | 48 | Gnsb-High Pt.-Win Sal | 20.3% | 87 | 5 | 5.75% | 0.288 |
| 71 | KFMB | CBS | 49 | San Diego | 20.6% | 113 | 14 | 12.39% | 0.601 |
| 79 | KGTV | NBC | 49 | San Diego | 20.6% | 132 | 16 | 12.12% | 0.588 |
| 85 | KCPX | ABC | 50 | Salt Lake City | 6.9% | 81 | 3 | 3.70% | 0.537 |
| 144 | KUTV | NBC | 50 | Salt Lake City | 6.9% | 87 | 1 | 1.15% | 0.167 |
| 145 | KSL | CBS | 50 | Salt Lake City | 6.9% | 137 | 1 | 0.73% | 0.106 |

*Network Affiliates Ranked by Percent Minorities Employed in High Pay Positions*

| Rank | Call letters | Net. afl. | Mkt. No. | Location | High pay positions | High pay minorities employed | |
|---|---|---|---|---|---|---|---|
| | | | | | | Number | Percent |
| 11 | WNBC | NBC | 1 | New York City | 179 | 26 | 14.53% |
| 19 | WCBS | CBS | 1 | New York City | 181 | 23 | 12.71% |
| 45 | WABC | ABC | 1 | New York City | 138 | 13 | 9.42% |
| 1 | KABC | ABC | 2 | Los Angeles | 162 | 45 | 27.78% |
| 5 | KNBC | NBC | 2 | Los Angeles | 174 | 29 | 16.67% |
| 31 | KNXT | CBS | 2 | Los Angeles | 253 | 28 | 11.07% |
| 27 | WMAQ | NBC | 3 | Chicago | 236 | 27 | 11.44% |
| 30 | WLS | ABC | 3 | Chicago | 224 | 25 | 11.16% |
| 58 | WBBM | CBS | 3 | Chicago | 211 | 17 | 8.06% |
| 26 | WPVI | ABC | 4 | Philadelphia | 121 | 14 | 11.57% |
| 48 | WCAU | CBS | 4 | Philadelphia | 56 | 5 | 8.93% |
| 96 | KYW | NBC | 4 | Philadelphia | 159 | 9 | 5.66% |
| 55 | WWJ | NBC | 5 | Detroit | 129 | 11 | 8.53% |
| 60 | WJBK | CBS | 5 | Detroit | 138 | 11 | 7.97% |
| 62 | WXYZ | ABC | 5 | Detroit | 181 | 14 | 7.73% |
| 64 | WNAC | CBS | 6 | Boston | 132 | 10 | 7.58% |
| 75 | WBZ | NBC | 6 | Boston | 131 | 9 | 6.87% |
| 18 | WKYC | NBC | 7 | Cleveland | 155 | 20 | 12.90% |
| 52 | WJW | CBS | 7 | Cleveland | 115 | 10 | 8.70% |
| 90 | WEWS | ABC | 7 | Cleveland | 116 | 7 | 6.03% |
| 3 | KGO | ABC | 8 | San Francisco | 189 | 38 | 20.11% |
| 15 | KPIX | CBS | 8 | San Francisco | 110 | 15 | 13.64% |
| 34 | KRON | NBC | 8 | San Francisco | 165 | 18 | 10.91% |
| 80 | WIIC | NBC | 9 | Pittsburgh | 120 | 8 | 6.67% |
| 84 | KDKA | CBS | 9 | Pittsburgh | 107 | 7 | 6.54% |
| 105 | WTAE | ABC | 9 | Pittsburgh | 103 | 5 | 4.85% |
| 6 | WRC | NBC | 10 | Washington, D.C | 170 | 27 | 15.88% |
| 12 | WTOP | CBS | 10 | Washington, D.C | 111 | 16 | 14.41% |
| 17 | WMAL | ABC | 10 | Washington, D.C | 128 | 17 | 13.28% |
| 63 | KDFW | CBS | 11 | Dallas-Fort Worth | 105 | 8 | 7.62% |
| 86 | WBAP | NBC | 11 | Dallas-Fort Worth | 112 | 7 | 6.25% |
| 97 | WFAA | ABC | 11 | Dallas-Fort Worth | 148 | 8 | 5.41% |
| 85 | KMOX | CBS | 12 | St. Louis | 110 | 7 | 6.36% |
| 91 | KTVI | ABC | 12 | St. Louis | 83 | 5 | 6.02% |
| 134 | KSD | NBC | 12 | St. Louis | 94 | 2 | 2.13% |
| 137 | WCCO | CBS | 13 | Minneapolis-St. Paul | 162 | 3 | 1.85% |
| 138 | KSTP | NBC | 13 | Minneapolis-St. Paul | 119 | 2 | 1.68% |
| 146 | KMSP | ABC | 13 | Minneapolis-St. Paul | 48 | 0 | 0.0% |
| 70 | WRTV | NRC | 14 | Indianapolis | 97 | 7 | 7.22% |
| 87 | WISH | CBS | 14 | Indianapolis | 64 | 4 | 6.25% |
| 139 | WLWI | ABC | 14 | Indianapolis | 66 | 1 | 1.52% |
| 36 | KHOU | CBS | 15 | Houston | 75 | 8 | 10.67% |
| 37 | KTRK | ABC | 15 | Houston | 75 | 8 | 10.67% |
| 50 | KPRC | NBC | 15 | Houston | 102 | 9 | 8.82% |
| 13 | KING | NBC | 16 | Seattle-Tacoma | 112 | 16 | 14.29% |
| 100 | KIRO | CBS | 16 | Seattle-Tacoma | 94 | 5 | 5.32% |
| 120 | KOMO | ABC | 16 | Seattle-Tacoma | 132 | 5 | 3.79% |
| 21 | WSB | NBC | 17 | Atlanta | 104 | 13 | 12.50% |
| 24 | WAGA | CBS | 17 | Atlanta | 109 | 13 | 11.93% |
| 51 | WQXI | ABC | 17 | Atlanta | 80 | 7 | 8.75% |
| 14 | WTVJ | CBS | 18 | Miami | 127 | 18 | 14.17% |
| 25 | WCKT | NBC | 18 | Miami | 102 | 12 | 11.76% |
| 53 | WPLG | ABC | 18 | Miami | 105 | 9 | 8.57% |
| 28 | WBAL | NBC | 19 | Baltimore | 114 | 13 | 11.40% |
| 92 | WMAR | CBS | 19 | Baltimore | 100 | 6 | 6.00% |
| 94 | WJZ | ABC | 19 | Baltimore | 86 | 5 | 5.81% |
| 39 | WKRC | ABC | 20 | Cincinnati | 57 | 6 | 10.53% |
| 101 | WLWT | NBC | 20 | Cincinnati | 134 | 7 | 5.22% |
| 116 | WCPO | CBS | 20 | Cincinnati | 103 | 4 | 3.88% |
| 81 | WTMJ | NBC | 21 | Milwaukee | 105 | 7 | 6.67% |
| 110 | WITI | ABC | 21 | Milwaukee | 95 | 4 | 4.21% |
| 140 | WISN | CBS | 21 | Milwaukee | 78 | 1 | 1.28% |
| 66 | WHNB | NBC | 22 | Hartford-New Haven | 54 | 4 | 7.41% |
| 79 | WTIC | CBS | 22 | Hartford-New Haven | 119 | 8 | 6.72% |
| 88 | WTNH | ABC | 22 | Hartford-New Haven | 65 | 4 | 6.15% |
| 76 | KCMO | CBS | 23 | Kansas City | 59 | 4 | 6.78% |
| 89 | KMBC | ABC | 23 | Kansas City | 82 | 5 | 6.10% |
| 115 | WDAF | NBC | 23 | Kansas City | 51 | 2 | 3.92% |
| 54 | WFLA | NBC | 24 | Tampa-St. Petersburg | 82 | 7 | 8.54% |
| 128 | WTVT | CBS | 24 | Tampa-St. Petersburg | 92 | 3 | 3.26% |
| 136 | WLCY | ABC | 24 | Tampa-St. Petersburg | 52 | 1 | 1.92% |
| 68 | WCR | NBC | 25 | Buffalo | 55 | 4 | 7.27% |

| Rank | Call letters | Net. aff. | Mkt. No. | Location | High pay positions | High pay minorities employed | |
|---|---|---|---|---|---|---|---|
| | | | | | | Number | Percent |
| 93 | WKBW | ABC | 25 | Buffalo | 67 | 4 | 5.97% |
| 106 | WBEN | CBS | 25 | Buffalo | 103 | 5 | 4.85% |
| 67 | KGW | NBC | 26 | Portland | 96 | 7 | 7.29% |
| 117 | KOIN | CBS | 26 | Portland | 78 | 3 | 3.85% |
| 119 | KATU | ABC | 26 | Portland | 79 | 3 | 3.80% |
| 44 | KOVR | ABC | 27 | Sacramento-Stockton | 83 | 8 | 9.64% |
| 46 | KXTV | CBS | 27 | Sacramento-Stockton | 66 | 6 | 9.09% |
| 74 | KCRA | NBC | 27 | Sacramento-Stockton | 101 | 7 | 6.93% |
| 8 | WLWC | NBC | 28 | Columbus | 73 | 11 | 15.07% |
| 29 | WTVN | ABC | 28 | Columbus | 62 | 7 | 11.29% |
| 103 | WBNS | CBS | 28 | Columbus | 98 | 5 | 5.10% |
| 7 | WREC | CBS | 29 | Memphis | 52 | 8 | 15.38% |
| 10 | WHBQ | ABC | 29 | Memphis | 61 | 9 | 14.75% |
| 33 | WMC | NBC | 29 | Memphis | 64 | 7 | 10.94% |
| 22 | WSIX | ABC | 30 | Nashville | 58 | 7 | 12.07% |
| 102 | WSM | NBC | 30 | Nashville | 97 | 5 | 5.15% |
| 114 | WLAC | CBS | 30 | Nashville | 76 | 3 | 3.95% |
| 9 | WVUE | ABC | 31 | New Orleans | 74 | 11 | 14.86% |
| 61 | WWL | CBS | 31 | New Orleans | 88 | 7 | 7.95% |
| 126 | WDSU | NBC | 31 | New Orleans | 89 | 3 | 3.37% |
| 69 | KBTV | ABC | 32 | Denver | 83 | 6 | 7.23% |
| 95 | KMGH | CBS | 32 | Denver | 88 | 5 | 5.68% |
| 107 | KOA | NBC | 32 | Denver | 66 | 3 | 4.55% |
| 78 | WSAZ | NBC | 33 | Charleston-Huntingto | 59 | 4 | 6.78% |
| 133 | WCHS | CBS | 33 | Charleston-Huntingto | 44 | 1 | 2.27% |
| 145 | WHTN | ABC | 33 | Charleston-Huntingto | 36 | 0 | 0.00% |
| 77 | WPRI | CBS | 34 | Providence | 59 | 4 | 6.78% |
| 118 | WJAR | NBC | 34 | Providence | 78 | 3 | 3.85% |
| 123 | WTEV | ABC | 34 | Providence | 56 | 2 | 3.57% |
| 47 | WSOC | NBC | 35 | Charlotte | 78 | 7 | 8.97% |
| 57 | WBTV | CBS | 35 | Charlotte | 109 | 9 | 8.26% |
| 104 | WCCB | ABC | 35 | Charlotte | 20 | 1 | 5.00% |
| 113 | WAVE | NBC | 36 | Louisville | 76 | 3 | 3.95% |
| 121 | WHAS | CBS | 36 | Louisville | 83 | 3 | 3.61% |
| 130 | WLKY | ABC | 36 | Louisville | 37 | 1 | 2.70% |
| 65 | WAST | ABC | 37 | Albany-Schenectady-T | 53 | 4 | 7.55% |
| 83 | WTEN | CBS | 37 | Albany-Schenectady-T | 61 | 4 | 6.56% |
| 143 | WRGB | NBC | 37 | Albany-Schenectady-T | 64 | 0 | 0.0% |
| 20 | WBMG | CBS | 38 | Birmingham | 24 | 3 | 12.50% |
| 72 | WBRC | ABC | 38 | Birmingham | 56 | 4 | 7.14% |
| 132 | WAPI | NBC | 38 | Birmingham | 40 | 1 | 2.50% |
| 43 | WHIO | CBS | 39 | Dayton | 82 | 8 | 9.76% |
| 131 | WLWD | NBC | 39 | Dayton | 75 | 2 | 2.67% |
| 23 | WLOS | ABC | 40 | Gnville-Sptnbg-Ashvi | 58 | 7 | 12.07% |
| 49 | WFBC | NBC | 40 | Gnville-Sptnbg-Ashvi | 45 | 4 | 8.89% |
| 142 | WSPA | CBS | 40 | Gnville-Sptnbg-Ashvi | 45 | 0 | 0.0% |
| 111 | WZZM | ABC | 41 | Kalamazoo-Gr Rapids | 48 | 2 | 4.17% |
| 122 | WOTV | NBC | 41 | Kalamazoo-Gr Rapids | 83 | 3 | 3.61% |
| 147 | WKZO | CBS | 41 | Kalamazoo-Gr Rapids | 51 | 0 | 0.0% |
| 42 | KOCO | ABC | 41 | Oklahoma City | 59 | 6 | 10.17% |
| 82 | KWTV | CBS | 41 | Oklahoma City | 60 | 4 | 6.67% |
| 127 | WKY | NBC | 41 | Oklahoma City | 90 | 3 | 3.33% |
| 56 | WNYS | ABC | 43 | Syracuse | 48 | 4 | 8.33% |
| 98 | WSYR | NBC | 43 | Syracuse | 75 | 4 | 5.33% |
| 109 | WHEN | CBS | 43 | Syracuse | 45 | 2 | 4.44% |
| 32 | WTAR | CBS | 44 | Norf-Newp News-Hamp | 82 | 9 | 10.98% |
| 40 | WAVY | NBC | 44 | Norf-Newp News-Hamp | 58 | 6 | 10.34% |
| 135 | WVEC | ABC | 44 | Norf-Newp News-Hamp | 47 | 1 | 2.13% |
| 35 | KOOL | CBS | 45 | Phoenix | 83 | 9 | 10.84% |
| 73 | KTVK | ABC | 45 | Phoenix | 56 | 4 | 7.14% |
| 99 | KTAR | NBC | 45 | Phoenix | 75 | 4 | 5.33% |
| 2 | KENS | CBS | 45 | San Antonio | 57 | 12 | 21.05% |
| 4 | KSAT | ABC | 45 | San Antonio | 64 | 12 | 18.75% |
| 16 | WOAI | NBC | 45 | San Antonio | 60 | 8 | 13.33% |
| 108 | WSPD | NBC | 45 | Toledo | 67 | 3 | 4.48% |
| 125 | WTOL | CBS | 45 | Toledo | 59 | 2 | 3.39% |
| 129 | WDHO | ABC | 45 | Toledo | 33 | 1 | 3.03% |
| 38 | WGHP | ABC | 48 | Gnsb-High Pt-Win Sal | 57 | 6 | 10.53% |
| 71 | WFMY | CBS | 48 | Gnsb-High Pt-Win Sal | 70 | 5 | 7.14% |
| 112 | WXII | NBC | 48 | Gnsb-High Pt-Win Sal | 73 | 3 | 4.11% |
| 41 | KGTV | NBC | 49 | San Diego | 98 | 10 | 10.20% |
| 59 | KFMB | CBS | 49 | San Diego | 87 | 7 | 8.05% |
| 124 | KCPX | ABC | 50 | Salt Lake City | 58 | 2 | 3.45% |
| 141 | KSL | CBS | 50 | Salt Lake City | 101 | 1 | 0.99% |
| 144 | KUTV | NBC | 50 | Salt Lake City | 62 | 0 | 0.0% |

*Network Affiliates Ranked by Percent Women Employed in High Pay Positions*

| Rank | Call letters | Net. aff. | Mkt. No. | Location | High pay positions | High pay women employed | |
|---|---|---|---|---|---|---|---|
| | | | | | | Number | Percent |
| 13 | WCBS | CBS | 1 | New York City | 181 | 20 | 11.05% |
| 17 | WNBC | NBC | 1 | New York City | 179 | 19 | 10.61% |
| 65 | WABC | ABC | 1 | New York City | 138 | 9 | 6.52% |
| 6 | KABC | ABC | 2 | Los Angeles | 162 | 21 | 12.96% |
| 38 | KNBC | NBC | 2 | Los Angeles | 174 | 15 | 8.62% |
| 72 | KNXT | CBS | 2 | Los Angeles | 253 | 15 | 5.93% |
| 25 | WLS | ABC | 3 | Chicago | 224 | 22 | 9.82% |
| 33 | WBBM | CBS | 3 | Chicago | 211 | 19 | 9.00% |
| 41 | WMAQ | NBC | 3 | Chicago | 236 | 20 | 8.47% |
| 1 | WCAU | CBS | 4 | Philadelphia | 56 | 14 | 25.00% |
| 51 | WPVI | ABC | 4 | Philadelphia | 121 | 9 | 7.44% |
| 70 | KYW | NBC | 4 | Philadelphia | 159 | 10 | 6.29% |
| 18 | WXYZ | ABC | 5 | Detroit | 181 | 19 | 10.50% |
| 109 | WWJ | NBC | 5 | Detroit | 129 | 5 | 3.88% |
| 132 | WJBK | CBS | 5 | Detroit | 138 | 3 | 2.17% |
| 24 | WBZ | NBC | 6 | Boston | 131 | 13 | 9.92% |
| 112 | WNAC | CBS | 6 | Boston | 132 | 5 | 3.79% |
| 67 | WKYC | NBC | 7 | Cleveland | 155 | 10 | 6.45% |
| 128 | WJW | CBS | 7 | Cleveland | 115 | 3 | 2.61% |
| 138 | WEWS | ABC | 7 | Cleveland | 116 | 2 | 1.72% |
| 34 | KGO | ABC | 8 | San Francisco | 189 | 17 | 8.99% |
| 53 | KPIX | CBS | 8 | San Francisco | 110 | 8 | 7.27% |
| 63 | KRON | NBC | 8 | San Francisco | 165 | 11 | 6.67% |
| 22 | WIIC | NBC | 9 | Pittsburgh | 120 | 12 | 10.00% |
| 93 | WTAE | ABC | 9 | Pittsburgh | 103 | 5 | 4.85% |
| 125 | KDKA | CBS | 9 | Pittsburgh | 107 | 3 | 2.80% |
| 2 | WMAL | ABC | 10 | Washington D.C | 128 | 21 | 16.41% |
| 3 | WTOP | CBS | 10 | Washington D.C | 111 | 15 | 13.51% |
| 66 | WRC | NBC | 10 | Washington D.C | 170 | 11 | 6.47% |
| 37 | WFAA | ABC | 11 | Dallas-Fort Worth | 148 | 13 | 8.78% |
| 49 | KDFW | CBS | 11 | Dallas-Fort Worth | 105 | 8 | 7.62% |
| 100 | WBAP | NBC | 11 | Dallas-Fort Worth | 112 | 5 | 4.46% |
| 32 | KMOX | CBS | 12 | St. Louis | 110 | 10 | 9.09% |
| 83 | KSD | NBC | 12 | St. Louis | 94 | 5 | 5.32% |
| 46 | KTVI | ABC | 12 | St. Louis | 83 | 1 | 1.20% |
| 29 | WCCO | CBS | 13 | Minneapolis-St Paul | 162 | 15 | 9.26% |
| 43 | KMSP | ABC | 13 | Minneapolis-St Paul | 48 | 4 | 8.33% |
| 73 | KSTP | NBC | 13 | Minneapolis-St Paul | 119 | 7 | 5.88% |
| 8 | WLWI | ABC | 14 | Indianapolis | 66 | 8 | 12.12% |
| 28 | WISH | CBS | 14 | Indianapolis | 64 | 6 | 9.38% |
| 44 | WRTV | NBC | 14 | Indianapolis | 97 | 8 | 8.25% |
| 82 | KHOU | CBS | 15 | Houston | 75 | 4 | 5.33% |
| 106 | KTRK | ABC | 15 | Houston | 75 | 3 | 4.00% |
| 107 | KPRC | NBC | 15 | Houston | 102 | 4 | 3.92% |
| 10 | KOMO | ABC | 16 | Seattle-Tacoma | 132 | 15 | 11.36% |
| 35 | KING | NBC | 16 | Seattle-Tacoma | 112 | 10 | 8.93% |
| 122 | KIRO | CBS | 16 | Seattle-Tacoma | 94 | 3 | 3.19% |
| 23 | WQXI | ABC | 17 | Atlanta | 80 | 8 | 10.00% |
| 74 | WSB | NBC | 17 | Atlanta | 104 | 6 | 5.77% |
| 126 | WAGA | CBS | 17 | Atlanta | 109 | 3 | 2.75% |
| 14 | WTVJ | CBS | 18 | Miami | 127 | 14 | 11.02% |
| 19 | WPLG | ABC | 18 | Miami | 105 | 11 | 10.48% |
| 47 | WCKT | NBC | 18 | Miami | 102 | 8 | 7.84% |
| 56 | WBAL | NBC | 19 | Baltimore | 114 | 8 | 7.02% |
| 57 | WJZ | ABC | 19 | Baltimore | 86 | 6 | 6.98% |
| 105 | WMAR | CBS | 19 | Baltimore | 100 | 4 | 4.00% |
| 86 | WKRC | ABC | 20 | Cincinnati | 57 | 3 | 5.26% |
| 87 | WLWT | NBC | 20 | Cincinnati | 134 | 7 | 5.22% |
| 108 | WCPO | CBS | 20 | Cincinnati | 103 | 4 | 3.88% |
| 69 | WITI | ABC | 21 | Milwaukee | 95 | 6 | 6.32% |
| 76 | WIMJ | NBC | 21 | Milwaukee | 105 | 6 | 5.71% |
| 90 | WISN | CBS | 21 | Milwaukee | 78 | 4 | 5.13% |
| 42 | WTIC | CBS | 22 | Hartford-New Haven | 119 | 10 | 8.40% |
| 78 | WHNB | NBC | 22 | Hartford-New Haven | 54 | 3 | 5.56% |
| 141 | WTNH | ABC | 22 | Hartford-New Haven | 65 | 1 | 1.54% |
| 5 | KMBC | ABC | 23 | Kansas City | 82 | 11 | 13.41% |
| 135 | WDAF | NBC | 23 | Kansas City | 51 | 1 | 1.96% |
| 140 | KCMO | CBS | 23 | Kansas City | 59 | 1 | 1.69% |
| 113 | WFLA | NBC | 24 | Tampa-St. Petersburg | 82 | 3 | 3.66% |
| 121 | WTVT | CBS | 25 | Tampa-St. Petersburg | 92 | 3 | 3.26% |
| 137 | WLCY | ABC | 24 | Tampa-St. Petersburg | 52 | 1 | 1.92% |
| 79 | WGR | NBC | 25 | Buffalo | 55 | 3 | 5.45% |
| 123 | WKBW | ABC | 25 | Buffalo | 67 | 2 | 2.99% |
| 136 | WBEN | CBS | 25 | Buffalo | 103 | 2 | 1.94% |
| 68 | KATU | ABC | 26 | Portland | 79 | 5 | 6.33% |
| 88 | KGW | NBC | 26 | Portland | 96 | 5 | 5.21% |
| 89 | KOIN | CBS | 26 | Portland | 78 | 4 | 5.13% |

| Rank | Call letters | Net. aff. | Mkt. No. | Location | High pay positions | High pay women employed | |
|---|---|---|---|---|---|---|---|
| | | | | | | Number | Percent |
| 50 | KXTV | CBS | 27 | Sacramento-Stockton | 66 | 5 | 7.58% |
| 124 | KCRA | NBC | 27 | Sacramento-Stockton | 101 | 3 | 2.97% |
| 131 | KOVR | ABC | 27 | Sacramento-Stockton | 83 | 2 | 2.41% |
| 27 | WLWC | NBC | 28 | Columbus | 73 | 7 | 9.59% |
| 45 | WBNS | CBS | 28 | Columbus | 98 | 8 | 8.16% |
| 46 | WTVN | ABC | 28 | Columbus | 62 | 5 | 8.06% |
| 96 | WMC | NBC | 29 | Memphis | 64 | 3 | 4.69% |
| 111 | WREC | CBS | 29 | Memphis | 52 | 2 | 3.85% |
| 119 | WHBO | ABC | 29 | Memphis | 61 | 2 | 3.28% |
| 9 | WSIX | ABC | 30 | Nashville | 58 | 7 | 12.07% |
| 54 | WSM | NBC | 30 | Nashville | 97 | 7 | 7.22% |
| 85 | WLAC | CBS | 30 | Nashville | 76 | 4 | 5.26% |
| 15 | WVUE | ABC | 31 | New Orleans | 74 | 8 | 10.81% |
| 77 | WDSU | NBC | 31 | New Orleans | 89 | 5 | 5.62% |
| 99 | WWL | CBS | 31 | New Orleans | 88 | 4 | 4.55% |
| 71 | KOA | NBC | 32 | Denver | 66 | 4 | 6.06% |
| 95 | KBTV | ABC | 32 | Denver | 83 | 4 | 4.82% |
| 98 | KMGH | CBS | 32 | Denver | 88 | 4 | 4.55% |
| 12 | WHTN | ABC | 33 | Charleston-Huntingto | 36 | 4 | 11.11% |
| 60 | WCHS | CBS | 33 | Charleston-Huntingto | 44 | 3 | 6.82% |
| 139 | WSAZ | NBC | 33 | Charleston-Huntingto | 59 | 1 | 1.69% |
| 80 | WTEV | ABC | 34 | Providence | 56 | 3 | 5.36% |
| 91 | WPRI | CBS | 34 | Providence | 59 | 3 | 5.08% |
| 144 | WJAR | NBC | 34 | Providence | 78 | 1 | 1.28% |
| 21 | WCCB | ABC | 35 | Charlotte | 20 | 2 | 10.00% |
| 52 | WBTV | CBS | 35 | Charlotte | 109 | 8 | 7.34% |
| 110 | WSOC | NBC | 35 | Charlotte | 78 | 3 | 3.85% |
| 4 | WLKY | ABC | 36 | Louisville | 37 | 5 | 13.51% |
| 127 | WAVE | NBC | 36 | Louisville | 76 | 2 | 2.63% |
| 130 | WHAS | CBS | 36 | Louisville | 83 | 2 | 2.41% |
| 11 | WAST | ABC | 37 | Albany-Schenectady-T | 53 | 6 | 11.32% |
| 97 | WRGB | NBC | 37 | Albany-Schenectady-T | 64 | 3 | 4.69% |
| 120 | WTEN | CBS | 37 | Albany-Schenectady-T | 61 | 2 | 3.28% |
| 55 | WBRC | ABC | 38 | Birmingham | 56 | 4 | 7.14% |
| 103 | WBMG | CBS | 38 | Birmingham | 24 | 1 | 4.17% |
| 129 | WAPI | NBC | 38 | Birmingham | 40 | 1 | 2.50% |
| 81 | WLWD | NBC | 39 | Dayton | 75 | 4 | 5.33% |
| 114 | WHIO | CBS | 39 | Dayton | 82 | 3 | 3.66% |
| 36 | WFBC | NBC | 40 | Greenville-Spartansburg-Asheville. | 45 | 4 | 8.89% |
| 59 | WLOS | ABC | 40 | Greenville-Spartansburg-Asheville | 58 | 4 | 6.90% |
| 101 | WSPA | CBS | 40 | Greenville-Spartansburg-Asheville | 45 | 2 | 4.44% |
| 133 | WZZM | ABC | 41 | Kalamazoo-Gr Rapids | 48 | 1 | 2.08% |
| 134 | WKZO | CBS | 41 | Kalamazoo-Gr Rapids | 51 | 1 | 1.96% |
| 145 | WOTV | NBC | 41 | Kalamazoo-Gr Rapids | 83 | 1 | 1.20% |
| 61 | KWTV | CBS | 41 | Oklahoma City | 60 | 4 | 6.67% |
| 117 | KOCO | ABC | 41 | Oklahoma City | 59 | 2 | 3.39% |
| 118 | WKY | NBC | 41 | Oklahoma City | 90 | 3 | 3.33% |
| 64 | WHEN | CBS | 43 | Sycrcuse | 45 | 3 | 6.67% |
| 102 | WNYS | ABC | 43 | Syracuse | 48 | 2 | 4.17% |
| 143 | WSYR | NBC | 43 | Syracuse | 75 | 1 | 1.33% |
| 39 | WTAR | CBS | 44 | Norfolk-Newport News-Hampton | 82 | 7 | 8.54% |
| 40 | WVEC | ABC | 44 | Norfolk-Newport News-Hampton | 47 | 4 | 8.51% |
| 58 | WAVY | NBC | 44 | Norfolk-Newport News-Hampton | 58 | 4 | 6.90% |
| 16 | KTVK | ABC | 45 | Phoenix | 56 | 6 | 10.71% |
| 62 | KTAR | NBC | 45 | Phoenix | 75 | 5 | 6.67% |
| 115 | KOOL | CBS | 45 | Phoenix | 83 | 3 | 3.61% |
| 48 | KSAT | ABC | 45 | San Antonio | 64 | 5 | 7.81% |
| 84 | KENS | CBS | 45 | San Antonio | 57 | 3 | 5.26% |
| 92 | WOAI | NBC | 45 | San Antonio | 60 | 3 | 5.00% |
| 20 | WTOL | CBS | 45 | Toledo | 59 | 6 | 10.17% |
| 31 | WDHO | ABC | 45 | Toledo | 33 | 3 | 9.09% |
| 142 | WSPO | NBC | 45 | Toledo | 67 | 1 | 1.49% |
| 7 | WGHP | ABC | 48 | Greensboro-High Point-Winston Salem | 57 | 7 | 12.28% |
| 26 | WXII | NBC | 48 | Greensboro-High Point-Winston Salem | 73 | 7 | 9.59% |
| 75 | WFMY | CBS | 48 | Greensboro-High Point-Winston Salem | 70 | 4 | 5.71% |
| 30 | KFMB | CBS | 49 | San Diego | 87 | 8 | 9.20% |
| 104 | KGTV | NBC | 49 | San Diego | 98 | 4 | 4.08% |
| 94 | KUTV | NBC | 50 | Salt Lake City | 62 | 3 | 4.84% |
| 116 | KCPX | ABC | 50 | Salt Lake City | 58 | 2 | 3.45% |
| 147 | KSL | CBS | 50 | Salt Lake City | 101 | 0 | 0.0% |

## APPENDIX D

### THE TEN BEST AND TEN WORST STATIONS

In this Appendix are listed the ten best and ten worst stations in each area of programming and employment. The nine tables in Section 1 list stations entitled to special recognition for their outstanding performances. The stations in the nine tables in Section 2 should be singled out for their abysmally low performances.

### 1. THE TEN BEST

a. The ten best stations in overall programming ranking are:

| Rank | Call sign | Channel | Affiliation | City |
|---|---|---|---|---|
| **1** | **KPIX-TV** | **5** | **CBS** | **San Francisco** |
| **2** | **WJZ-TV** | **13** | **ABC** | **Baltimore** |
| **3** | **KING-TV** | **5** | **NBC** | **Seattle-Tacoma** |
| **4** | **KDKA-TV** | **2** | **CBS** | **Pittsburgh** |
| **5** | **KYW-TV** | **3** | **NBC** | **Philadelphia** |
| **6** | **WPLG-TV** | **10** | **ABC** | **Miami** |
| **7** | **WMAL-TV** | **7** | **ABC** | **Washington, D.C.** |
| **8** | **WTAE-TV** | **4** | **ABC** | **Pittsburgh** |
| **9** | **WFMY-TV** | **2** | **CBS** | **Greensboro-High Point-Winston Salem** |
| **10** | **KGW-TV** | **8** | **NBC** | **Portland** |

b. The ten best stations in News-Public Affairs-"Other" programming are:

| Rank | Call sign | Channel | Affiliation | City |
|---|---|---|---|---|
| 1 | WPLG-TV | 10 | ABC | Miami |
| 2 | WMAQ-TV | 5 | NBC | Chicago |
| 3 | KNBC-TV | 4 | NBC | Los Angeles |
| 4 | WCBS-TV | 2 | CBS | New York City |
| 5 | WAGA-TV | 5 | CBS | Atlanta |
| 6 | KDKA-TV | 2 | CBS | Pittsburgh |
| 7 | KYW-TV | 3 | NBC | Philadelphia |
| 8 | KNXT-TV | 2 | CBS | Los Angeles |
| 9 | WCAU-TV | 10 | CBS | Philadelphia |
| 10 | WTOP-TV | 9 | CBS | Washington, D.C. |

c. The ten best stations in (lack of) Commercial Matter Concentration are:

| Rank | Call sign | Channel | Affiliation | City |
|---|---|---|---|---|
| 1 | KPIX-TV | 5 | CBS | San Francisco |
| 2 | WFMY-TV | 2 | CBS | Greensboro-High Point-Winston Salem |
| 3 | WPRI-TV | 12 | CBS | Providence |
| 4 | WJZ-TV | 13 | ABC | Baltimore |
| 5 | WTIC-TV | 3 | ACB | Hartford-New Haven |
| 6 | KING-TV | 5 | NBC | Seattle-Tacoma |
| 6 | WDHO-TV | 24 | ABC | Toledo |
| 8 | WNYS-TV | 9 | ABC | Syracuse |
| 9 | WAST-TV | 13 | ABC | Albany-Schenectady-Troy |
| 10 | WTAE-TV | 4 | ABC | Pittsburgh |

d. The ten best stations in Local Programming are:

| Rank | Call sign | Channel | Affiliation | City |
|---|---|---|---|---|
| 1 | WLWT-TV | 5 | NBC | Cincinnati |
| 2 | KYW-TV | 3 | NBC | Philadelphia |
| 3 | KNBC-TV | 4 | NBC | Los Angeles |
| 4 | KDKA-TV | 2 | CBS | Pittsburgh |
| 5 | WSB-TV | 2 | NBC | Atlanta |
| 6 | WJZ-TV | 13 | ABC | Baltimore |
| 7 | WWL-TV | 4 | CBS | New Orleans |
| 8 | KTAR-TV | 12 | NBC | Phoenix |
| 9 | WWJ-TV | 4 | NBC | Detroit |
| 10 | WPLG-TV | 10 | ABC | Miami |

e. The ten best stations in the percentage of Revenues used for Program Expenses are:

| Rank | Call sign | Channel | Affiliation | City |
|---|---|---|---|---|
| 1 | WABC-TV | 7 | ABC | New York |
| 2 | KGW-TV | 3 | NBC | Portland |
| 3 | KING-TV | 5 | NBC | Seattle-Tacoma |
| 4 | WAST-TV | 13 | ABC | Albany-Schenectady-Troy |
| 5 | KOVR-TV | 13 | ABC | Sacramento-Stockton |
| 6 | KSL-TV | 5 | CBS | Salt Lake City |
| 7 | WRC-TV | 4 | NBC | Washington, D.C. |
| 8 | WIIC-TV | 11 | NBC | Pittsburgh |
| 9 | WMAL-TV | 7 | ABC | Washington, D.C. |
| 10 | WSYR-TV | 3 | NBC | Syracuse |

f. The ten best stations in the Number of Public Service Announcements presented are:

| Rank | Call sign | Channel | Affiliation | City |
|---|---|---|---|---|
| 1 | WKY-TV | 4 | NBC | Oklahoma City |
| 2 | WJZ-TV | 13 | ABC | Baltimore |
| 3 | KYW-TV | 3 | NBC | Philadelphia |
| 4 | WLCY-TV | 10 | ABC | Tampa-St. Petersburg |
| 5 | KOIN-TV | 6 | CBS | Portland |
| 6 | WTVT-TV | 13 | CBS | Tampa-St. Petersburg |
| 7 | WJAR-TV | 10 | NBC | Providence |
| 8 | KWTV-TV | 9 | CBS | Oklahoma City |
| 9 | KDKA-TV | 2 | CBS | Pittsburgh |
| 10 | WPVI-TV | 6 | ABC | Philadelphia |

g. The ten best stations in Minority Employment are:

| Rank | Call sign | Channel | Affiliation | City |
|---|---|---|---|---|
| 1 | WTEV-TV | 6 | ABC | Providence |
| 2 | WNYS-TV | 9 | ABC | Syracuse |
| 3 | WPRI-TV | 12 | CBS | Providence |
| 4 | WBZ-TV | 4 | NBC | Boston |
| 5 | WSAZ-TV | 3 | NBC | Charleston-Huntington |
| 6 | KING-TV | 5 | NBC | Seattle-Tacoma |
| 7 | KGW-TV | 8 | NBC | Portland |
| 8 | WHTN-TV | 13 | ABC | Charleston-Huntington |
| 9 | WHEN-TV | 5 | CBS | Syracuse |
| 10 | WCHS-TV | 8 | CBS | Charleston-Huntington |

h. The ten best stations in Minority High Pay Employment are:

| Rank | Call sign | Channel | Affiliation | City |
|---|---|---|---|---|
| 1 | KABC-TV | 7 | ABC | Los Angeles |
| 2 | KENS-TV | 5 | CBS | San Antonio |
| 3 | KGO-TV | 7 | ABC | San Francisco |
| 4 | KSAT-TV | 12 | ABC | San Antonio |
| 5 | KNBC-TV | 4 | NBC | Los Angeles |
| 6 | WRC-TV | 4 | NBC | Washington, D.C. |
| 7 | WREC-TV | 3 | CBS | Memphis |
| 8 | WLWC-TV | 4 | NBC | Columbus |
| 9 | WVUE-TV | 8 | ABC | New Orleans |
| 10 | WHBQ-TV | 13 | ABC | Memphis |

i. The ten best stations in the High Pay Employment of Women are:

| Rank | Call sign | Channel | Affiliation | City |
|---|---|---|---|---|
| 1 | WCAU-TV | 10 | CBS | Philadelphia |
| 2 | WMAL-TV | 7 | ABC | Washington, D.C. |
| 3 | WTOP-TV | 9 | CBS | Washington, D.C. |
| 4 | WLKY-TV | 32 | ABC | Louisville |
| 5 | KMBC-TV | 9 | ABC | Kansas City |
| 6 | KABC-TV | 7 | ABC | Los Angeles |
| 7 | WGHP-TV | 8 | ABC | Greensboro-High Point-Winston Salem |
| 8 | WLWI-TV | 13 | ABC | Indianapolis |
| 9 | WSIX-TV | 8 | ABC | Nashville |
| 10 | KOMO-TV | 4 | ABC | Seattle-Tacoma |

## 2. THE TEN WORST

a. The ten worst stations in the overall programming ranking are:

| Rank | Call sign | Channel | Affiliation | City |
|---|---|---|---|---|
| 135 | KMBC-TV | 9 | ABC | Kansas City |
| 136 | WTVN-TV | 6 | ABC | Columbus |
| 137 | WVEC-TV | 13 | ABC | Norfolk-Newport News-Hampton |
| 138 | WKZO-TV | 3 | CBS | Kalamazoo-Grand Rapids |
| 139 | WBMG-TV | 42 | CBS | Birmingham |
| 140 | KOOL-TV | 10 | CBS | Phoenix |
| 141 | WHBQ-TV | 13 | ABC | Memphis |
| 142 | KBTV-TV | 9 | ABC | Denver |
| 143 | WQXI-TV | 11 | ABC | Atlanta |
| 144 | WCCB-TV | 18 | ABC | Charlotte |

b. The ten worst stations in News-Public Affairs-"Other" programming are:

| Rank | Call sign | Channel | Affiliation | City |
|---|---|---|---|---|
| 135 | WVEC-TV | 13 | ABC | Norfolk-Newport News-Hampton |
| 136 | KCPX-TV | 4 | ABC | Salt Lake City |
| 137 | WLOS-TV | 13 | ABC | Greenville-Spartanburg-Asheville |
| 138 | WKRC-TV | 12 | ABC | Cincinnati |
| 139 | WHBQ-TV | 13 | ABC | Memphis |
| 140 | KTVI-TV | 2 | ABC | St. Louis |
| 141 | KMSP-TV | 9 | ABC | Minneapolis-St. Paul |
| 142 | WLKY-TV | 32 | ABC | Louisville |
| 143 | WNYS-TV | 9 | ABC | Syracuse |
| 144 | WDHO-TV | 24 | ABC | Toledo |

c. The ten worst stations in overcommercialization are:

| Rank | Call sign | Channel | Affiliation | City |
|---|---|---|---|---|
| 135 | WHIO-TV | 7 | CBS | Dayton |
| 136 | KFMB-TV | 8 | CBS | San Diego |
| 137 | WLWD-TV | 2 | NBC | Dayton |
| 138 | KNBC-TV | 4 | NBC | Los Angeles |
| 139 | WCCO-TV | 4 | CBS | Minneapolis-St. Paul |
| 140 | KOOL-TV | 10 | CBS | Phoenix |
| 141 | WBBM-TV | 2 | CBS | Chicago |
| 142 | KBTV-TV | 9 | ABC | Denver |
| 143 | WLS-TV | 7 | ABC | Chicago |
| 144 | WDAF-TV | 4 | NBC | Kansas City |

d. The ten worst stations in Local Programming are:

| Rank | Call sign | Channel | Affiliation | City |
|---|---|---|---|---|
| 135 | WAST-TV | 13 | ABC | Albany-Schenectady-Troy |
| 136 | WLKY-TV | 32 | ABC | Louisville |
| 137 | WVEC-TV | 13 | ABC | Norfolk-Newport News-Hampton |
| 138 | WHBQ-TV | 13 | ABC | Memphis |
| 139 | WDHO-TV | 24 | ABC | Toledo |
| 140 | WHTN-TV | 13 | ABC | Charleston-Huntington |
| 141 | WGR-TV | 2 | NBC | Buffalo |
| 142 | KCPX-TV | 4 | ABC | Salt Lake City |
| 143 | KLOS-TV | 13 | ABC | Greenville-Spartanburg-Asheville |
| 144 | WNYS-TV | 9 | ABC | Syracuse |

e. The ten worst stations in the Percentage of Revenues used for Program Expenses are:

| Rank | Call sign | Channel | Affiliation | City |
|---|---|---|---|---|
| 135 | WISH-TV | 8 | CBS | Indianapolis |
| 136 | WHNB-TV | 30 | NBC | Hartford-New Haven |
| 137 | WCCB-TV | 18 | ABC | Charlotte |
| 138 | WBZ-TV | 4 | NBC | Boston |
| 139 | WSAZ-TV | 3 | NBC | Charleston-Huntington |
| 140 | WCHS-TV | 8 | CBS | Charleston-Huntington |
| 141 | KDFW-TV | 4 | CBS | Dallas-Fort Worth |
| 142 | WKZO-TV | 3 | CBS | Kalamazoo-Grand Rapids |
| 143 | WBMG-TV | 42 | CBS | Birmingham |
| 144 | WBRC-TV | 6 | ABC | Birmingham |

f. The ten worst stations in the Number of Public Service Announcements presented are:

| Rank | Call sign | Channel | Affiliation | City |
|---|---|---|---|---|
| 135 | WTMJ-TV | 4 | NBC | Milwaukee |
| 136 | WDSU-TV | 6 | NBC | New Orleans |
| 137 | KTVI-TV | 2 | ABC | St. Louis |
| 138 | WSIX-TV | 8 | ABC | Nashville |
| 139 | WLAC-TV | 5 | CBS | Nashville |
| 140 | KIRO-TV | 7 | CBS | Seattle-Tacoma |
| 141 | WXYZ-TV | 7 | ABC | Detroit |
| 142 | WSM-TV | 4 | NBC | Nashville |
| 143 | WHIO-TV | 7 | CBS | Dayton |
| 144 | WHNB-TV | 30 | NBC | Hartford-New Haven |

g. The ten worst stations in Minority Employment are:

| Rank | Call sign | Channel | Affiliation | City |
|---|---|---|---|---|
| 138 | KOA-TV | 4 | NBC | Denver |
| 139 | WWL-TV | 4 | CBS | New Orleans |
| 140 | WLCY-TV | 10 | ABC | Tampa-St. Petersburg |
| 141 | WVEC-TV | 13 | ABC | Norfolk-Newport News-Hampton |
| 142 | WDHO-TV | 24 | ABC | Toledo |
| 143 | WAPI-TV | 13 | NBC | Birmingham |
| 144 | KUTV-TV | 2 | NBC | Salt Lake City |
| 145 | KSL-TV | 5 | CBS | Salt Lake City |
| 146 | KMSP-TV | 13 | ABC | Minneapolis-St. Paul |
| 146 | WKZO-TV | 3 | CBS | Kalamazoo-Grand Rapids |

h. The ten worst stations in Minority High Pay Employment are:

| Rank | Call sign | Channel | Affiliation | City |
|---|---|---|---|---|
| 138 | KSTP-TV | 5 | NBC | Minneapolis-St. Paul |
| 139 | WLWI-TV | 13 | ABC | Indianapolis |
| 140 | WISN-TV | 12 | CBS | Milwaukee |
| 141 | KSL-TV | 5 | CBS | Salt Lake City |
| 142 | WSPA-TV | 7 | CBS | Greenville-Spartanburg-Asheville |
| 142 | WRGB-TV | 6 | NBC | Albany-Schenectady-Troy |
| 142 | KUTV-TV | 2 | NBC | Salt Lake City |
| 142 | WHTN-TV | 13 | ABC | Charleston-Huntington |
| 142 | KMSP-TV | 9 | ABC | Minneapolis-St. Paul |
| 142 | WKZO-TV | 3 | CBS | Kalamazoo-Grand Rapids |

i. The ten worst stations in High Pay Employment of Women are:

| Rank | Call sign | Channel | Affiliation | City |
|---|---|---|---|---|
| 138 | WEWS-TV | 5 | ABC | Cleveland |
| 139 | WSAZ-TV | 3 | NBC | Charleston-Huntington |
| 139 | KCMO-TV | 5 | CBS | Kansas City |
| 141 | WTNH-TV | 8 | ABC | Hartford-New Haven |
| 142 | WSPD-TV | 13 | NBC | Toledo |
| 143 | WSYR-TV | 3 | NBC | Syracuse |
| 144 | WJAR-TV | 10 | NBC | Providence |
| 145 | WOTV-TV | 8 | NBC | Kalamazoo-Grand Rapids |
| 145 | KTVI-TV | 2 | ABC | St. Louis |
| 147 | KSL-TV | 5 | CBS | Salt Lake City |

## APPENDIX E

### SETTING RECOMMENDED AND MINIMUM LEVELS OF PERFORMANCE

There are certain recommended levels of performance which we have concluded every network-affiliated television station in the top 50 markets should strive to meet. Recommended levels do not necessarily reflect the most desirable performance, but merely the level of performance above which a station can be said to be giving an acceptable level of attention to the "public interest, convenience and necessity."

On the other hand, there are certain minimal levels below which no station should be allowed to fall. These minimums do not reflect desirable levels of performance, but rather levels which have arbitrarily been depressed to such a point as to permit the majority of the stations to meet them. Any station not meeting *these* levels is taking a risk, in our judgment, of license renewal challenge or adverse FCC action at some point in the future.

You will note that certain of these standards are expressed as percentages. Since the Chapter 1 programming analysis was based on hours and minutes, we have determined the number of stations meeting the percentage standards by applying the percentage to an average composite week of 135 hours.

| | Minimum levels of performance | Number of stations meeting minimum | Recommended levels of performance | Number of stations meeting recommended |
|---|---|---|---|---|
| Total of News, Public Affairs and "Other" Programming (%) | 15% | 127 | 20% | 91 |
| Public Service Announcements (number) | 150 | 111 | 200 | 71 |
| | (in addition, at least 50% of a station's psas should be of a local nature) | | | |
| Commercialization (number of 60 minute segments with more than 12 minutes of commercials) | 40 | 97 | 20 | 10 |
| Local Programming (%) | 10% | 67 | 15% | 6 |
| Total Minority Employment—while we recognize the undesirable aspects of a "quota" system for employment of minorities, we feel a good balance should be maintained between the percent of minorities employed and the percent of minorities in the SMSA, for total employment and high pay employment alike. Just 26 stations employed a total percentage of minorities equal to or greater than the percentage of minorities in the SMSA, and only three stations met that standard for high pay employment. | | | | |
| Employment of Women—The employment of women in high pay positions should at least correspond to the percentage of women in the workforce in the SMSA. Unfortunately, this data was not available to us. However, no station employed women in numbers equivalent to the 35% presence of women in the national workforce. | | | | |

## APPENDIX F

### THE TOP FIFTY MARKETS

#### 1. TOP 50 MARKETS LISTED BY MARKET SIZE

| Market Number: | *Market name* |
|---|---|
| 1 | New York City |
| 2 | Los Angeles |
| 3 | Chicago |
| 4 | Philadelphia |
| 5 | Detroit |
| 6 | Boston |
| 7 | Cleveland |
| 8 | San Francisco |
| 9 | Pittsburgh |
| 10 | Washington, D.C. |
| 11 | Dallas-Fort Worth |
| 12 | St. Louis |
| 13 | Minneapolis-St. Paul |
| 14 | Indianapolis |
| 15 | Houston |
| 16 | Seattle-Tacoma |
| 17 | Atlanta |
| 18 | Miami |
| 19 | Baltimore |
| 20 | Cincinnati |
| 21 | Milwaukee |
| 22 | Hartford-New Haven |
| 23 | Kansas City |
| 24 | Tampa-St. Petersburg |
| 25 | Buffalo |
| 26 | Portland |
| 27 | Sacramento-Stockton |
| 28 | Columbus |
| 29 | Memphis |
| 30 | Nashville |
| 31 | New Orleans |
| 32 | Denver |
| 33 | Charleston-Huntington |
| 34 | Providence |
| 35 | Charlotte |
| 36 | Louisville |
| 37 | Albany-Schenectady-Troy |
| 38 | Birmingham |
| 39 | Dayton |
| 40 | Greenville-Spartanburg-Asheville |
| 41 | Kalamazoo-Grand Rapids |
| 41 | Oklahoma City |
| 43 | Syracuse |
| 44 | Norfolk-Newport News-Hampton |
| 45 | Phoenix |
| 45 | San Antonio |
| 45 | Toledo |
| 48 | Greensboro-High Point-Winston Salem |
| 49 | San Diego |
| 50 | Salt Lake City |

### 2. TOP 50 MARKETS LISTED ALPHABETICALLY

| Market Number: | *Market name* |
|---|---|
| 37 | Albany-Schenectady-Troy |
| 17 | Atlanta |
| 19 | Baltimore |
| 38 | Birmingham |
| 6 | Boston |
| 25 | Buffalo |
| 33 | Charleston-Huntington |
| 35 | Charlotte, N.C. |
| 3 | Chicago |
| 20 | Cincinnati |
| 7 | Cleveland |
| 28 | Columbus, Ohio |
| 11 | Dallas-Ft. Worth |
| 39 | Dayton |
| 32 | Denver |
| 5 | Detroit |
| 41 | Grand Rapids-Kalamazoo |
| 48 | Greensboro-Winston Salen-High Point |
| 40 | Greenville-Spartanburg-Asheville |
| 22 | Hartford-New Haven |
| 15 | Houston |
| 14 | Indianapolis |
| 23 | Kansas City |
| 2 | Los Angeles |
| 36 | Louisville |
| 29 | Memphis |
| 18 | Miami |
| 21 | Milwaukee |
| 13 | Minneapolis-St. Paul |
| 30 | Nashville |
| 31 | New Orleans |
| 1 | New York |
| 44 | Norfolk-Portsmouth-Newport News-Hampton |
| 41 | Oklahoma City |
| 4 | Philadelphia |
| 45 | Phoenix |
| 9 | Pittsburgh |
| 26 | Portland, Oregon |
| 34 | Providence |
| 27 | Sacramento-Stockton |
| 12 | St. Louis |
| 50 | Salt Lake City |
| 45 | San Antonio |
| 49 | San Diego |
| 8 | San Francisco |
| 16 | Seattle-Tacoma |
| 43 | Syracuse |
| 24 | Tampa-St. Petersburg |
| 45 | Toledo |
| 10 | Washington, D.C. |